

**MAYFLOWER
OIL SPILL
DEPOSITION
SUMMARIES**

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DEPOSITION SUMMARY OF CHRISTIAN ALEXANDER

Pages

5 DOB: 12/25/70

5 He is originally from Nigeria, but has lived in United States since 1993.

8 Divorced with one son.

10-18 He was in college for about a year and half before having to leave to work. He then worked as a cook and had training to be a chef. He reviews jobs and places he lived after his training. He now works as a personal chef when needed. He has also bought some tow trucks and started his own towing company.

19 He lives at 26 Ledrick Circle in Mayflower since November 2004.

21 Has never been in the military.

22 He did not miss any work as a result of the oil spill.

23 He is concerned about his health. He never had a nosebleed until after the spill and now has been having a lot of them although they have subsided. During the months after the oil spill, he would wake up a lot with headaches or migraines.

24 He currently takes medication for high blood pressure.

26-27 Has never been hospitalized, but did go to the hospital for a migraine headache after the spill.

29 He has never smoked cigarettes. Has occasional beer. No illicit drugs.

30-35 He was at work when he first learned about the oil spill. His neighbor called to tell him about the smell. He noticed the smell on his way home when he got close to the gas station. The smell got stronger and stronger and at his house, the smell was unbearable.

35-37 The next morning he recalls having a nosebleed and coughing. He felt a scratching in his throat and thought maybe he was coming down with a cold. He sneezed and saw some blood. He also had a headache.

- 37-43 They discuss his jobs and job duties as a chef in detail.
- 43 When he returned home the next night he again noticed the smell.
- 44 They locate his house on a map.
- 47 On Sunday morning, his son woke up with a nosebleed for the first time ever. The smell was still horrible on Sunday afternoon. He had a headache that afternoon.
- 50-55 He describes how his dog was acting and how he kept barking and barking and he did not know what was wrong with him. He kept acting this way until the following Friday when he came home and the dog had died. The vet had told him there was nothing wrong with him and that he was not sick when he took him because of the constant barking.
- 57-59 He circles his house on a map and describes directions to get to his house.
- 60-61 He stayed in the hotel he worked at for the first few days after the spill because of work being busy. However, he would go home to check on his dog or have his neighbors check on him.
- 62-65 The smell did not start to go away for maybe 3 weeks, but was not as bad as it was in the beginning. However, when it rained you could smell it. He even tried to sell his house last year to get away from the area, but was unable to sell it.
- 65 He does not think he still smells the smell but does get headaches from time to time. He did replace the carpeting in his house with a hardwood floor because he felt the smell was in his house.
- 67 He still gets nosebleeds and migraines from time to time. His doctor could not tell him what was causing these symptoms.
- 69-71 In the months after the oil spill he would have occasional nosebleeds and constant headaches. He also had a sore throat. These symptoms lasted for about 6 months or maybe longer. He still occasionally has nosebleeds, but not often. No one has told him that they think the oil spill contributed to his symptoms.

71-74 He is concerned about his future health. He describes how he has tried to sell his house.

75 He never saw any oil on his property. He did see some in the neighborhood down the street.

77-80 He describes how he talked to someone from the news station and someone from Exxon or working for Exxon who was in his neighborhood. He does not know of any air or soil testing being done.

81-86 He did see workers cleaning up with suits in the ditch on his property. His concern was how come they were wearing suits and he wasn't.

88 He believes the value of his house and property have gone down because of the oil spill.

89-90 He did attend meetings held in town about the oil spill.

93-98 They again look at map and discuss where his house is located and how to get there. They also discuss the ditch in his backyard.

100 He stayed at the hotel after the spill, not because he was busy, but because of the smell at his house.

100 In addition to the nosebleed his son had when he was home that first weekend, he also had a sore throat and coughed a little bit. He would still experience those symptoms when he would return for future visits.

101 He also had trouble with a bad taste in his mouth.

107 He and his neighbor used to fish, but they no longer do so. He is also concerned about walking his dog in the neighborhood.

DEPOSITION SUMMARY OF CONNIE WEST (6/20/16)

Pages

7 Address: 25 Ledrick Circle, Mayflower

9 DOB: 8/17/67

9 Married with one son

10 Works at Arkansas BC/BS as an analyst for 22 years.

11-14 She reviews education and places they have lived. They moved to 25 Ledrick Circle in 2003.

15-16 She was off the day of the oil spill and was in town shopping when she noticed the smell. She got a headache and was getting nauseous. She went home. She heard about the spill later that afternoon from neighbors. She stayed home that night.

17-19 They went to the Northwoods subdivision some time later to see what was going on. Some of the houses had already been torn down. There was still some cleanup activity going on. She has been back a few times to see what is going on. She can step out her front door and see the subdivision but has to go out and around on the highway to get there.

20-21 The smell was really strong that first day when she was shopping. She could smell it outside when she got home and a little bit when inside her house. The smell stayed for a while. She cannot specifically say when it went away because she thinks she got used to the smell.

22-23 She kept a record of her headaches for the first month and then stopped. She is not sure how long they lasted. She still occasionally has them. At first they were occurring every day. She took OTC medication.

24 The nausea did not last as long as the headaches. She thinks as she got used to the smell the queasiness went away.

25 She did not see a doctor for her symptoms.

26-28 His son also had headaches. He has asthma and she was worried about him.

29-34 She is concerned about their future health. They went to the town meeting that discussed the chemicals.

34 She has not talked to her doctor about long-term effects.

35 She received a newsletter from Exxon in the mail but did not speak to anyone.

36-37 She used to fish but stopped before the spill.

38-39 She did not actually see oil in Lake Conway but thinks there must have been because she saw the booms in the lake.

39 She did not see any oil on their property.

39 She did not see any dead animals or wildlife except on the news.

40 Their cat died shortly after the spill. The vet did not give any indication that it was related to the spill.

41-46 They discuss when they purchased their house. She thinks the value has gone down since the oil spill. She describes their house and work they have done to it.

46 There was no air, water, or soil testing done after the spill. They did see someone driving around in the neighborhood in a vehicle with "air quality" on the side.

48-57 She describes the disruption and nuisance created by the cleanup. Her son moved out that May because of the oil spill.

54-55 They filed bankruptcy several years ago and currently have another one filed.

59-62 Her attorney asks her about growing up in the area, who she knows, and how the spill affected their activities.

63 She still sees cleanup workers from time to time and this concerns her.

64-65 They discuss her concern about their property value going down.

- 66 People have told her that they still smell the smell, but she can't say if she is still smelling it because she thinks she might be immune to the smell.
- 66-67 She still occasionally gets a headache and thinks it could be related.
- 67-69 She is asked about other possible symptoms. She did have watery eyes and problems breathing related to smelling the strong smell, but not problems actually breathing.
- 70 They would try to leave the area as much as possible to get away from the spill.
- 70 She believes there is damage to the ecosystem and environment from the spill. They used to see deer in their neighborhood, but have not since the spill.

DEPOSITION SUMMARY OF CRAIG BULLARD (3/22/16)

Pages

6 DOB: 4/24/78

7 Current address: 8715 Worth Avenue, Benton, Arkansas
since September 2014.

9-13 Worked as a cook and waited tables while taking IT
classes. He then went to work for Alltel doing
application support for 2 to 3 years. He now works for
Fidelity Information Services since 2003 as an IT
security analyst.

13 No military service

13 Married with one son

14 No other lawsuits

15 Current health is fine

16-24 On the day of the oil spill he was on his way home from
work when he noticed a very pungent overpowering smell.
He saw a road crew on the bridge and a black substance
in the ditch. He called and told his wife they needed
to leave when she got home because the smell was
horrendous. They go through this in more detail. He
thinks he learned about the oil spill from talking to
his neighbor.

25-30 The smell was very nauseating. By the time they left
the house, he had a really bad headache. They left for
the weekend and went to his in-law's house. When they
returned on Sunday, the smell was still overwhelming.
Some of the roads were blocked.

31 The smell caused headaches and would make him dizzy. He
woke up at night with nosebleeds and had trouble going
to sleep because the smell was so bad. He cannot recall
how long the smell was that intense, but says it was a
very long time.

33 They moved from Chardonnay Cove in September 2014 and
there were still times then when the smell would be
lingering.

34-36 He was still having difficulty sleeping, headaches and nosebleeds at least six months later, in December. He is not sure about a year after the spill, but says he remembers the nosebleeds going on for awhile. He did not seek any medical care for his symptoms. He took OTC medication. If they left the area for the weekend, his headaches did subside until he returned.

38-44 They look at a medical record from June 24, 2013, when he called for a refill on his prescription for restless leg syndrome. They look at another record of a visit for his restless leg syndrome in July 2013. At that time he reported no health concerns to his doctor.

44 At the time of that visit in July 2013, he was smoking half a pack a day and was a social drinker.

45 He was never evacuated from his house. He never saw any oil on his property.

46-52 He recalls when two gentlemen came and spoke to him. He does not recall whether or not he had called the claim line. They had their house for sale at that time. He does not recall any other conversations with anyone from ExxonMobil. He thinks the men came out within the first 2 weeks. They discussed his concerns.

52-54 He attempted to attend one town hall meeting.

54-75 They discuss trying to sell their house in 2010 and then the sale of the house in 2014, and also review documents from when they had their house built. He believes the house sold for less in 2014 because of the oil spill.

75 Not claiming any medical expenses.

76-84 He describes how his life has changed since the oil spill as the basis for his claim. He did not want to move and had thought of Mayflower as the perfect place to live. He describes how the area changed after the oil spill. He used to fish in Lake Conway.

89 He is concerned about his and his family's health.

90-92 He again explains why he felt he had to leave Mayflower and that having to leave is his main claim in this lawsuit.

92-106 They discuss the roadblocks and other nuisances related
the activity that went on in the area after the spill.
There was a lot of noise day and night. There were a
lot of dead animals.

DEPOSITION SUMMARY OF CRYSTAL HOBBY (3/31/16)

Pages

- 7-12 Lives at 60 Ledrick Circle, Mayflower, since 2011. She locates this on a few different maps. She also indicates on the map where the oil spill occurred in the Northwoods Subdivision.
- 13-18 They discuss her education. She went to work straight out of high school. She has worked doing payroll and bookkeeping and taxes.
- 18 Never been in the military.
- 18 Married with no children
- 19 No other lawsuits. Filed bankruptcy in 2005.
- 19 Has never smoked.
- 20-23 In good health. Runs several times a week. Started Cross Fit last year.
- 24-25 She does not go to her regular doctor very often, but did go see him for a wellness checkup to make sure she did not have any exposures after the Exxon spill. Records show she went on April 24, 2013 and May 3, 2013 and had blood tests and was told everything okay.
- 26 Recently saw her gynecologist because having trouble conceiving. She has low progesterone.
- 28 No doctor has told her that she has any medical illness or condition related to the Mayflower oil spill.
- 28 Had a cyst removed from her left side in her 20s.
- 29 No chronic medical conditions and takes no medications. Does not have allergies or asthma, although has had to take Claritin sometimes during pollen season and hay season.
- 30-34 She learned about the oil spill while at work. Her boss saw it on the TV. She didn't leave work until later in the evening and by that time traffic was getting bad. She started to smell the smell while on I-40 on her way to Mayflower, a few miles from the exit. She directs them through how she gets home from work.

34-35 There was a lot of chaos and commotion going on.

36 She saw oil in a ditch on the way home.

36-37 The smell was pretty intense when she got home. She describes it like the smell when you spill gasoline on yourself and you can't get away from the smell. It was not technically a gasoline smell, but it was an intense disgusting smell. She could smell it inside her house, but it was not as intense.

37 They stayed there that night and were not evacuated.

38-41 She went to work the next day and thinks she was gone most of the day. When she returned home there was a lot more commotion because the cleanup had started and there were a lot more workers.

42 They did not leave their home for any extended time. They had a dog and didn't want to leave her alone.

42 She does not recall any cleanup workers in her neighborhood.

43 She describes how the cleanup affected them with the trucks and workers around.

44-45 The smell lasted a few months and even after that time she could still smell it every now and then. It wasn't as strong as time went on, but you could still get a whiff of it. She recalls running one time last year and still being able to smell something noticeable.

45-48 She got headaches from the smell, but recalls about a week after the spill she got the worst migraine of her life. She describes how she felt with the migraine.

49 She also had a little nausea with loss of appetite.

51-53 The cleanup "lasted forever," she thinks a good year, but the first 6 months were the most aggravating with the trucks and lights and other activity throughout the night.

54 She did not talk to any representatives from Exxon and did not call the claims line.

55-56 They discuss the value of their house and whether they have plans to sell it. She has been concerned about the value having gone down after the oil spill.

56-57 There was no air or soil testing done on her property.

57-59 She knows a few of her neighbors. She does not know of anyone that moved from Ledrick Circle because of the oil spill. She did see a lot of for sale signs go up.

61-66 They review some of her medical records. She went to see her doctor, Dr. Carfagno, on April 24, 2013 because she was worried about exposure to the oil spill. It mentions the migraine she had the first week. He checked her lungs and did blood work including testing for benzene.

67 Dr. Carfagno indicates in her record "Without direct contact or prolonged exposure, I doubt she would have troubles with petroleum related toxicity above the background levels in our society."

67-69 She had another visit to her doctor on May 3, 2013 for a wellness check and record states she "seems to be very healthy."

71-74 Her attorney has her review her symptoms after the spill.

75-77 She describes changes in activities she would do after the oil spill.

77-81 This was their first house they bought and they discuss living in Mayflower.

82-83 They were married in 2012 and they discuss her concerns about not yet conceiving.

83-86 They discuss other disruptions after the oil spill, such as the traffic.

87-89 They again discuss her nausea. She had just told her attorney she experienced nausea for a few months and it is noted that on her visit to her doctor on May 3 she never mentioned nausea or headaches. She says it is because she has a tendency to downplay if she is sick.

90-92 She does not recall telling her gynecologist about the oil spill.

DEPOSITION SUMMARY OF DEANNA MASSEY (9/6/16)

Pages

5 DOB: 8/15/92

5-12 Lives at 24 Mayflower Lane, Mayflower. Owns this property and 177 Highway 89 North with her fiancée, Jeffrey Williams. She identifies properties on a map.

13-16 In March 2013, she was living at 177 Highway 89. Her home was about 2 miles from the Northwoods Subdivision where the oil spill occurred.

17-20 They discuss her education. Currently working on degree in nursing.

21 She has two children.

22 No military service.

22-26 She has worked as a lifeguard and cleaning houses.

27 She describes a car accident she was involved in.

28 She was not working at the time of the oil spill.

29 She explains why she is involved in lawsuit. She doesn't want to move from Mayflower. She is worried that her health has been worse since the oil spill. She is worried about her and her children's future health.

30-31 She has never had problems with allergies until after the oil spill when she felt like she was always going to the doctor's with sinus infections and needing antibiotics and her children were getting upper respiratory infections. She has developed bad allergies and has had to use an inhaler and has started taking Singulair. These symptoms started within a month or two and have been pretty consistent since.

32 She has used the inhaler a handful of times since the oil spill. She had not used one prior to the spill.

33-37 She describes children's symptoms, although she is not certain they are all related to the oil spill.

39-41 She says she used to be a closet smoker and describes what this means. She may have a cigarette now and then, but does not consider herself a smoker.

41 She has been diagnosed with allergy-related asthma, but no other medical conditions. She had hyperthyroidism when she was pregnant.

42 She has had surgery for kidney stones.

43 On the day of the spill she was at 40 Mayflower Lane. Someone called her and told her about the spill. She walked outside and could smell that was like a tarry, nasty smell. The smell lasted probably a month or two.

45 She was not evacuated.

46-52 She saw oil in a wetland behind the Subway. She saw guys in hazard suits and yellow caution tape around that area. She also saw oil in the cove.

53 No oil physically got on their property she says except for in the air.

53-54 She has heard that air testing was done and she thinks they concluded that it was initially safe.

55 She had heard there was testing for oil in Lake Conway and none was found, but she does not necessarily believe them.

55 They could faintly smell the smell inside their house, but it was much more prominent outside.

56 They review her symptoms after the spill. She had sinus infections, allergies, headaches, and dizziness. No doctor has told her that her symptoms are related to the oil spill. She thinks she went to her doctor, Dr. Greenwood, for her symptoms within the first few months.

58-59 They look at a medical record from April 2, 2013 when she was seen for abdominal pain. Under Respiratory it said she was negative for cough and dyspnea and she agrees she did not have those symptoms in the days following the oil spill.

60 There is another visit to her doctor dated May 8, 2013 when she was seen for lab work for hyperthyroidism. She says she was not feeling well and was attributing her symptoms to her hyperthyroidism.

62-65 In April 2016, she was seen again but asthma is not listed under current problems. She says she was diagnosed with asthma and prescribed an inhaler at a walk-in clinic. She thinks she may have mentioned her asthma issues to her primary care doctor.

65-66 Her asthma problems started around the beginning of the summer of 2013 when she would get short of breath. She would wake up with a headache and she would have allergy-type symptoms.

67-68 They look at a medical record from a visit to Dr. Greenwood dated June 20, 2013. This also indicated negative for cough and shortness of breath. She explains why she probably didn't tell her doctor about her prior episodes of shortness of breath. She had gone there for a painful sore in her nose and says that she was focused on that and not her shortness of breath.

69-71 They talk about her kid's symptoms.

72-73 She describes how the cleanup activities affected her life.

73-75 She thinks the value of their properties has been affected because people will not want to buy property in Mayflower now. They discuss the value of the houses.

75 Neither property was affected by the tornado in 2014.

75 She did not communicate with anyone from Exxon and did not attend any community meetings. She thought those were only for people who had been evacuated.

76-78 Her attorney asks her to describe how her life was affected by the oil spill and cleanup.

78 She thinks she saw some turtles with oil on them. She does not know if they were dead or not.

78 Her anxiety has increased and she worries a lot more. She worries about her children's future health and wonders whether they should move.

79-80 She worried when she saw the workers with hazmat suits and worried about her daughter who was only 3 months old at the time.

DEPOSITION SUMMARY OF ELLEN BURGESS (3/23/16)

- 7 DOB: 12/3/63
- 7-14 Lives at 39 Meadowlark Loop, Mayflower, with some friends. She owns a home at 26 Dam Road, which someone rents. That property is part of this lawsuit.
- 15 She is currently disabled with multiple sclerosis. She has a nursing degree and her last job was a psychiatric nurse at Bridgeway Hospital. Prior to that, she was an oncology nurse for 15 years.
- 17 She was diagnosed with MS in 2003 and became disabled from work in the beginning of 2013. She lives on her SSDI.
- 19 Her MS causes severe loss of balance. She falls quite often and has to use a cane at times. She has extreme fatigue and slurred speech. Her legs get very tired, especially with the heat.
- 19 She sees Dr. Archer for her MS and has a regular doctor, Dr. Greenwood. She recently started seeing a specialist, Dr. Rico, for intestinal issues.
- 20 She does not drink alcohol.
- 21 She was a regular smoker up until 2010 when she stopped smoking, but then started again for a short time, but only smoked a couple of cigarettes.
- 22 On the day of the spill, she was inside at Meadowlark Loop when she noticed the smell. She has burning of her eyes and nose and coughing.
- 23 They discuss neighbors that live nearby.
- 24-27 She left friends' house and went and stayed in an apartment closer to her parents for 2 to 3 days after the spill to get away from the smell. She then returned to her friends' house because she was concerned about them.
- 27 They look at map and locate where the house she rents is located. She can see water from that house.

28 She describes that first weekend after the spill and what was happening in the neighborhood. She thinks she saw some Exxon representatives out in the neighborhood, but does not remember whether she spoke to them.

29 She never went to any of the town meetings and never called the claim line that was set up.

29 She describes smell as smelling like diesel fuel. She says she can still smell it pretty much all the time now, especially when it rains or is really humid, although it is not as intense as it was in March 2013.

31 She had some coughing and burning of her nose and eyes. She had a taste and smell that lingered in her nose and mouth. She also had headaches and sometimes had nausea. She did discuss with her doctor when she went for her regular MS checkup.

33-39 She is quite worried about her property value going down at 26 Dam Road. They discuss what she pays for her mortgage and what the appraised amount was in 2010. Her renter was going to buy the house but is now hesitant.

42-47 She saw oil on her property on Dam Road. She could see the oil sheen on the entire cove. She saw dead fish, dead snakes, and dead turtles. They look at some photos of her yard that she thinks her renter must have taken.

49 She believes her MS was exacerbated by the spill because of the stress. She had headaches and stiff legs for about a month off and on after the spill.

50-51 She is not aware of any soil testing done on her property. She thinks they must have done air testing. She does not know about water testing.

52 She cleared out vines and things that were dying from the oil on her property.

53-61 They review time line of where she has lived.

61-62 The oil was on the shoreline and up to the gate on her property. She marks on map.

63-64 She describes how this has been stressful for her. She is currently on Prozac.

- 66 She describes the dead animals and fish that would wash up on her property.
- 67 They again discuss the smell since the spill.
- 68-80 She describes cleanup activities she saw, how long they lasted, and how this has caused her stress.

DEPOSITION SUMMARY OF EUGENE SHEA (5/18/16)

PAGES

- 5 Address: 25 Oak Street, Mayflower
- 5 DOB: 7/29/70
- 5 He is suing Exxon for loss of use of his home during the time of the oil spill, and having to deal with the smell, the traffic, and having to use his inhaler more than he should have had to.
- 5 His house was about three blocks from the oil spill, less than half a mile. He marks on map where his house is located.
- 7 The afternoon of the spill he was going into Conway and drove through town and realized there was an oil spill when he saw oil running through.
- 8 He had loss of use of his home as he left during the day because of the smell and would only go home at night to take care of his dogs. The smell was strong and extremely bad for the first 3 or 4 days and lasted several months.
- 10 Employed by Kimberly Clark as a supervisor for almost 26 years.
- 12-13 He describes other disturbances from the cleanup, such as the noise and the lights from the cleanup. The increase in traffic was also a problem, increasing his commute to work.
- 14-17 He started using an inhaler for his asthma a couple of months before the oil spill. Before the spill, his doctor told him to use it twice a day, at least one or two puffs in the morning and at night. After the spill he had difficulty breathing and it was hard to catch his breath and had to use his inhaler at least three or four times at night when he was there. This lasted for three or four days while the smell was the strongest.
- 17-19 A couple of weeks after the spill he did call the claims center about the devaluation of his property due to the spill and about his increased use of his inhaler. He also called the county assessor's office

but was told they were not going to do any reassessing of properties out of concern that a devaluation of properties would affect the tax base for the schools.

- 20-22 He believes his property has diminished in value because of the spill because there are still 16 houses in the Northwoods subdivision for sale empty.
- 24 He has a heart condition, probably some type of arrhythmia and takes Carvedilol.
- 25-26 When he went to see his doctor several months after the spill, they discussed the oil spill and his doctor prescribed Singulair, because he was concerned about his breathing, which he still takes currently. He thinks he went at that time for a sinus infection.
- 27-29 The first record they have for that provider is from December 2013 for an annual physical, but he thinks he went to see his doctor prior to that time. The record shows he was having low back pain at that time and was taking 12 to 14 Advil a day for it. It also shows he was being treated for sinusitis and had asthma.
- 30 At that time, he was smoking less than a pack a day and was given Chantix. He had been smoking probably 10 years or more.
- 31 He definitely remembers going to see his doctor prior to the time of his annual physical.
- 31 There is a record of a visit in October 2014, 18 months after the spill, when he was seen for sinus and chest congestion and his asthma flaring up and getting worse over the last year. They review other office records from that doctor.
- 32-33 He points out that he had asthma and other issues prior to the oil spill, and has never said that the oil spill caused any of his problems.
- 34-35 He had issues with the people he bought his house from and had a lawsuit and explains about that.
- 36 He has not submitted any bills to Exxon for reimbursement and the only bill he has right now he would like reimbursed is for curtains.

37-39 They discuss another piece of property he owns behind his house that he bought in order to add onto his house.

39 He had minor damage from the tornado in 2014.

40 He did not attend any of the community meetings.

41 He describes in detail his symptoms and reactions to the oil spill in response to his attorney's request to describe his breathing difficulties. The smell in the air was horrendous and foul. The air felt thick and he had difficulty breathing and it was hard to catch his breath.

42 He felt nauseous probably the first day and after that says he got used to the smell. The smell left a bad chemical taste in his mouth that lasted for months.

42 The smell was the strongest for 3 to 4 weeks. Then over time the smell dissipated. You could still smell it, but it wasn't as strong. This went on for several months. It took a very long time before he entirely stopped smelling it.

43-46 He describes how the oil spill disrupted his life with the noise and lights from trucks and noise in the cove. He did not run his central air during the time after the spill because he did not want any outside air coming in.

46-47 He is worried about lasting health effects.

47 He saw workers in hazmat suits, which concerned him because if they were wearing them he worried about what he was dealing with.

48 He feels Exxon should be held accountable because according to the news reports they caused the oil spill. He did not know there was a pipeline there prior to the spill. If Exxon decided to turn the pipeline back on, he is going to protest to the EPA.

49-50 After 3 years he still sees oil sheen in the cove. He says he saw the oil sheen personally a few days ago when he went out to the cove. He had seen the news reports and wanted to see if it was true.

- 51 He lives across the interstate from the cove about four or five blocks away. He did not have any oil on his property.
- 52 He did use masks for a few days after the spill after seeing the worker in hazmat suits.
- 53 His doctor did not know what the long-term effects might be from the oil spill.
- 53-54 He experienced a suffocating feeling from time to time after the oil spill and would use his inhaler, which would help, but did not alleviate the feeling.
- 54-55 He describes his work schedule. He was off for Good Friday and the weekend and returned to work on Monday.
- 57 He is concerned about his health because of the difficulty he had breathing and what chemicals were in what he was breathing.
- 58-59 He did not see anyone working on his property, although he was gone for most of the day and returned often after dark, but did not see any evidence of anyone having worked on his property.

DEPOSITION SUMMARY OF JASON HAYS (3/30/16)

Pages

- 9 DOB: 6/24/71
- 10 Got GED and associates degree in electronic engineering technology.
- 11 Employment history: Worked at Bruno's Little Italy right after leaving high school for approximately 5 years, bussing tables. He then went to work for Grubbs, Garner & Hoskin, a drilling firm, working as a roughneck, for 2 years. He then went to work for his father's construction company, Hays Construction Co., doing asphalt paving, for 15 to 16 years.
- 13-17 He then moved to Florida for a short time and went to work as a night manager at Pizza Hut. He returned to Arkansas and worked for his father's company again until he went to work for Little Rock National Airport as an electronic technician for 6 months. He then went to work for Amtrak in 2009 as a passenger conductor, supervising the operation of the train, and has worked there since.
- 18 Married with no children.
- 19 Parents still living. Two half-sisters.
- 20 Never served in military.
- 20 Had a workers' comp claim about a year and a half ago after rupturing a biceps tendon and having a couple of surgeries. He missed almost a year of work. No other lawsuits.
- 21 No other surgeries and no hospitalizations.
- 21 Takes Lisinopril and Welbutrin. Has taken blood pressure medication for about 6 years and anxiety medication for about 8 months.
- 22-23 Had a work-related incident in 2012 that led to treatment for anxiety and depression. He thinks that anxiety or depression he has right now could be attributed to the spill.
- 24 He was treated with Cymbalta for about 6 months after the 2012 incident and was diagnosed with PTSD.

- 25-28 Believes his anxiety and depression could be attributed to the spill because he does not know what the future holds. He is concerned about his health and also about property values. He lives at 36 Ledrick Street in Mayflower. He describes how the area has changed since the spill.
- 29 He saw oil in the ditch line behind his house shortly after a heavy rain. He says "the stuff" was in the air for a long time and when he would step outside it would burn his eyes and he would have nausea. He is pretty positive the oil seeped into the environment and whenever it rained, it was in the air.
- 30-32 He describes where the water to the ditch comes from and how he thinks the oil got into the ditch.
- 32 He has stopped fishing in the lake he used to fish in because of his concerns.
- 33-37 They discuss the day of the spill, March 29, 2013. He had just got off work and was stopped on the bridge by the police and told about the oil spill. He was let through, and then started to smell a bad smell in the air. He also had burning of his eyes a couple of days later. He does not recall any symptoms that first night, just the heavy smell in the air.
- 38-43 He started to have sniffles and then later on that day is when his eyes started to hurt. Not long after he started having nausea, vomiting, diarrhea, and upper respiratory and wheezing issues. He had to take antibiotics. He does not recall when he first went to see a doctor. The symptoms lasted for a few weeks off and on. He had trouble holding things down. He had never had wheezing in his chest like that. He is still having trouble with wheezing a couple times a year after exercising.
- 43-44 The smell lasted a long time. He cannot recall how long, but it was as long as the cleanup crew was working on cleaning it up. He can even still smell it sometimes to this day, especially whenever it rains.
- 44-45 The only time he saw any oil was in the ditch behind his house.
- 47 To his knowledge, there has not been any air or soil testing or monitoring around his house and he has not requested this be done.

48-49 They review medical records from his doctor. He had a visit to the doctor on April 1, 2013, 3 or 4 days after the oil spill. Record states he was complaining of a productive cough present for the past 4 weeks with respiratory symptoms. He also had body aches, chest congestion, ear congestion, fever, heartburn, nasal congestion, nasal discharge, and maxillary sinus pain/pressure and had just finished a course of Augmentin 4 days before. He does not remember having the cough and sinus issues for 4 weeks before the spill.

52 A second visit was on June 19, 2013. At that time, he was complaining of a sore throat for the past 2 days with constant discomfort. He also had a productive cough, fever, malaise, nasal congestion, nausea, and rhinorrhea. He denied chest congestion, diarrhea, or vomiting. He reported recent exposure to illness from family members.

55 He noticed lights and noise from the equipment for the cleanup from his property that went on for weeks. He did receive a notice from Exxon saying they were working on cleaning up the spill.

59 He is concerned about developing some kind of cancer in the future.

60 Used to smoke, but hasn't in the last 15 years.

DEPOSITION SUMMARY OF JASON THOMPSON (3/20/17)

Pages

- 6 Address: 7110 Grace Road, Little Rock. At time of spill he lived at 128D Highway 89 South, Mayflower.
- 6 DOB: 5/6/77
- 8 He rented property he and his fiancée were living at. They moved from there sometime in the latter part of 2013. He continues with the places they have lived.
- 10-17 He locates the Highway 89 address on some maps. The house they lived in was on the water. He locates the Northwoods neighborhood on the map. He thinks this was approximately a mile and a half from where he lived.
- 18 They were never evacuated. He is not aware of any cleanup activities done on the property they lived on.
- 18-24 He describes what they were told was an oil disbursement foam that washed up along the water's edge on their property. It looked like big clusters of soap bubbles. This occurred the first or second month after the initial spill. They were told this by the Exxon officials.
- 24-29 He describes how oil got on the property from them rescuing animals from the lake and taking them onto their land to clean them up. They also found some goose eggs and cleaned those up.
- 30-32 He thinks oil got on their property from the tanker trucks that were removing oil to storage tanks and had oil on their tires and then when he or his fiancée drove over them they got oil on their tires and it ended up on their property.
- 32-33 He marks on a map where the storage tanks were across from their property that the tanker trucks were bringing oil to.
- 34-37 Divorced with five children
- 38-42 Not currently employed. Last job was working Alert Recovery as a repo agent until 2013 when he was injured dislocating his shoulder and breaking his arm and collar bone. He was not working at the time of the oil spill.

44 Has been smoking for about 20 years and currently
smokes a pack a day.

46 Claiming medical problems from oil spill. Had rash on
his stomach from holding the ducks with oil on them.
The rash was there for almost 3 years and he now has
scars on his stomach.

47 He also had bad headaches that could wake him up in the
middle of the night. He had nosebleeds a couple of
times. Developed hemorrhoids all of a sudden. If he
walked outside, his eyes, throat, and lungs would burn.
He had trouble with taste, was always tired, every once
in a while would get lightheaded. He also had nausea.

48-51 The rash started within the second month. He went to
the ER for treatment and was prescribed ointment. He
was reimbursed by Exxon for his visit.

52-55 At the time of the ER visit, he was also seen for the
other symptoms he was having: headaches, nosebleeds,
hemorrhoids, and eyes and throat burning. This was the
only time he was seen for his symptoms.

55 Once they moved from Mayflower, all their symptoms
stopped, except the rash that recurred.

58-63 They review his record from the above ER visit on April
18, 2013 and copies of the checks he was reimbursed by
Exxon.

63-66 On the day of the spill, he was home recovering from
his shoulder injury. His fiancée called him from the
restaurant she worked at and told him what happened. He
went down there. He describes what he saw going on when
he got there.

66 They did not think they were in any danger so they
stayed at their home.

67 He talks about the increase in traffic and how long it
took to get places.

70-73 He describes how he would feel when he would go outside
and how bad the headaches got at times.

73 He continued to smoke during this time, but he says not
as much because it hurt to smoke.

74 The continuous pain from the first headache lasted about a week, but then the headaches would come and go for the rest of the time they were there until they moved.

74 The burning eyes and throat started about the second week after the spill and lasted until they moved.

75 The hemorrhoids went away with OTC medications and did not return.

75 The first of the two nosebleeds occurred probably about 3 to 4 weeks after the spill.

76-80 People came around to their door and gave them fliers and literature regarding tar sand oil.

81-82 There was a checkpoint on the bridge in front of the cove that caused delays, he says starting the day after the spill and lasting for maybe 4 or 5 months.

82-85 He describes other cleanup activities that affected him.

85-88 The smell lasted until they moved in October. It wasn't as strong as in the beginning, but it was still there. There was a constant smell because of the storage containers across from their house. Even when they removed the containers after 2 or 3 weeks, he could still smell it, but it decreased in intensity. He returned to Mayflower in the summer of 2016 to visit a friend and could still smell the odor.

88-89 There was no air testing done at his house, but he did see the ADEQ taking air quality tests elsewhere. He saw results from the testing, but did not understand them. They did not have any soil or water testing, but he is aware of water testing in the cove.

90-101 He saw oil in the cove and in the main body of the lake. He says it was obvious it was oil. He stuck his hand into the water and came out with oil on his hand. He was fishing at the time. They discuss all the places he saw oil. He explains how a friend who used to work for Exxon showed them oil from the bottom of the dam and creek a year after the spill.

102-108 He describes times he has had contact with representatives from Exxon and one he heard about from a friend of his.

109 They ended up moving to his fiancée's mother's because they were both sick and just couldn't be there anymore. The restaurant his fiancée worked at had gotten shut down.

110-111 They discuss his fiancée's symptoms, although he says she was not exposed like he was.

112 He could not smell the smell inside the house where they lived, only outside. He thinks it was probably inside, but not strong enough to smell.

113-116 They discuss the rent they paid and what the house was like that they rented.

117 He had a dog at the time, but the dog did not have any problems from the spill. They kept her out of the water.

118 They discuss his shoulder injury and where he received treatment.

119-121 He lived in the same house back in 2005 and they discuss why he moved there originally and then moved back in 2012.

121-122 They discuss how his fishing and other activities changed after the oil spill.

123 They review his symptoms again. He had fatigue and sleep interruption, burning of his lungs, eyes, nose, but no sinus issues and no loss of appetite. He did have loss of taste, which he says kind of led to loss of appetite.

123 There were times when they would leave Mayflower just to get away from the smell for a while.

124-125 He explain show this event has upset him and how he wanted to live there, but now after everything that has happened he doesn't want to be there.

126 He has not seen any testing that has shown oil in the main body of Lake Conway.

127-130 They discuss a video he has showing the area around Mayflower right after the spill, some of which he filmed.

DEPOSITION SUMMARY OF JERRY WEST, JR (3/24/17)

Pages

- 6 DOB: 4/2/87
- 7 Current address: 25 Ledrick Circle, Mayflower. He lives there with his parents. He moved away from Mayflower sometime in the summer of 2013, after the oil spill, and recently came back home to live with his parents.
- 14-15 He is an auto mechanic by trade.
- 19-20 They discuss chronic medical conditions. He states that he has epilepsy, diagnosed in is senior year of high school. He goes to twice-yearly check-ups and is prescribed medication.
- 21-22 He also claims asthma as a chronic condition, beginning when he was a child. He hasn't had a medical appointment for his asthma in several years and hasn't had "a big attack" since he was a kid. Says it's been a few years since it has "flared up". He cannot remember having any medical treatment for his asthma since the oil spill
- 24, 30 The first thing he recollects about the oil spill is the smell, which he first describes as a "strong odor." When asked if the smell had any similarity to the petroleum products that he works around as part of his job, he answers that it was "familiar, but a lot stronger."
- 25-26 He first noticed the smell when he returned to Mayflower from work on the evening of the spill. He noticed it as his home when he opened his car door.
- 32 The smell got stronger over the next couple of days. He didn't initially smell it inside the home, but "it eventually got there."
- 42 The fumes were "always there" at his home.
- 46-47 They discuss that the reason he moved out of his home and left the Mayflower area was because of the spill. The smell was causing bad headaches, nausea, and making it hard to breathe.
- 48-49 He states that he would have really bad headaches, which would go away when he got to work for the day,

but would return as he was driving back to Mayflower.

49 He would get nausea from the headaches.

49 He found it difficult to breathe.

49 The headaches and related symptoms began sometime after the initial few days of the spill.

49 He took ibuprofen, but it didn't help any.

50 He states that the headaches occurred every day while he was in Mayflower, until he moved sometime in the summer. Same with the nausea, which began sometime during the week after the spill and stopped when he moved.

50 He did not go to a medical professional for treatment, primarily because he did not have health insurance.

51 He described his difficulty breathing as occurring from the time of the spill or a few days afterward until he moved from Mayflower.

52 States that the smell did not get any better for "at least a year", and that it was his recollection that it was basically as bad for that year as it was the initial weekend after the spill. After a year, he thinks it started to fade, but that it could still be smelled for at least another year. (He would make regular visits to see his parents in Mayflower after he moved).

54 When he moved from Mayflower, the headaches went away. When he would return for a visit, the headaches would return. He would try to go to see his parents at least once a week after he moved.

54-55 His girlfriend at the time would also get headaches when she would go with him to visit.

63-64 He further defines "harder to breathe" as more difficult to draw-in air, and wonders if the spill exacerbated his asthma.

64 Also had fatigue a couple of times per week while he lived in Mayflower, which he associates with the headaches.

DEPOSITION SUMMARY OF JERRY WEST (6/16/16)

Pages

7 Address: 25 Ledrick Circle, Mayflower

7 DOB: 10/18/64

9 Married with one son

11 Works for Xpress Global Systems as a truck driver for almost a year. They review his past employment.

14 Reviews relatives living in area

16-18 He describes house they live in. Locates the house on map. It is about a mile and a half from Lake Conway.

19 He was at work when he first heard about the oil spill. His wife called him and said there was a bad smell in the air.

20 He saw activity during his drive home.

20 He could smell it before he got home.

21 He stayed home that night. They were never evacuated.

22 The Northwoods subdivision is not far through the woods from their house.

23 The smell lasted quite a while but he cannot say how long.

24 He had headaches and a little bit of nausea. His symptoms would get better during the day when he was at work. He did not see a doctor.

25 Describes wife's and son's symptoms.

26-30 Describes disruptions caused by the cleanup of the oil spill.

31-34 He did not see any oil on their property. He says the property has never been tested so he doesn't know if maybe it could come through the groundwater. He believes the property is now worth less because of the oil spill.

35 He did not go to any town meetings and did not call the claims line.

36-38 He is concerned about the long-term effects on his health. He is also concerned about their property and their community, the vegetation, and the animals. There was no damage to any vegetation on his property.

39 Their cat died. He cannot rule out 100 percent that it was not a result of the oil spill.

40 Says things are getting better but are not normal. The vegetation is not back. No one wants to fish in the lake.

41 He did not actually see oil in the cove, but did see workers cutting a path back to the cove, so obviously something was going on.

42 The only dead animals he saw were on TV.

43 He describes what he means by the vegetation not coming back.

43 He estimates the Northwoods subdivision is 300 to 400 yards from his house, but a half to three-quarters of a mile if you drove it.

45 Smoked approximately a pack and half a day for about 30 years and quit in September 2013.

46-48 Has filed for bankruptcy twice, the second one is ongoing.

48 His headaches were stronger than a sinus headache. He has never had a migraine so cannot compare it to one. Took OTC medication.

49 His nausea was more of a queasy feeling. He did not take anything for it.

51 He saw a truck come through their neighborhood with "air quality" written on it, he believes the next day. He does not know the results of any testing.

52 They could smell the smell inside their home. They tried not to open any doors or windows. His wife burned candles.

53 He saw the cleanup people wearing white suits, gloves, boots, and respirators. This made him wonder if he needed to be worried about what they were breathing.

56 He believes his symptoms were caused by the oil spill because he did not have them before the spill.

56 He could taste something when he was outside because the smell was so strong.

57 If he stayed outside long enough he would get watery eyes.

58 On the weekends they tried to leave the area for as long as possible to get away from the smell, the noise, and the traffic.

59-61 He describes his concerns about what has happened to Mayflower.

63-64 He is asked why he has not done any research and why he has not gone on the Arkansas' website where there are documents that might give him peace of mind. He says he is not sure it would and why should he have to do the research. He did not attend any town meetings and did not make any effort to find out what information was provided. He did receive a newsletter from Exxon.

66 It is his belief that the pipeline goes through his neighborhood. According to paperwork when they bought their house it does show this.

67 He did not see any cleanup workers on his street.

DEPOSITION SUMMARY OF JESSE MCDOUGAL (5/11/16)

Pages

- 7 Has lived at 48 Snuggs Circle, Mayflower, for 25 years. His daughter lives with him and his son lives in a separate house behind his house on the same property. They all lived there at the time of the spill.
- 9 DOB: 11/16/52
- 9-14 Graduated high school, had a few part-time jobs while in school. He started working at Conark Construction in 1973, first as a laborer and then as a bricklayer, for about 8 years and was laid off. He then worked for himself for a number of years and then went to work for other bricklayers.
- 15 In February 2012, he had a ruptured hernia. He lost his foot and part of his lower intestines, and apparently he died and had to be revived twice.
- 16-18 He has been married twice to the same woman and is now divorced. He has a son and a daughter.
- 18 Never served in the military.
- 19 No other lawsuits, no WC claims. Receives SS disability benefits currently.
- 20 No other hospitalizations other than above. Has been to ER a few times for cuts and broken bones.
- 21 No regular medications currently. His only health issue right now is shortness of breath. He does not feel he has as much stamina as he should.
- 21 He occasionally smokes, 6-8 cigarettes a day. He started smoking after high school and says he has never been a heavy smoker.
- 22 He went to his primary care doctor, Dr. Hashmi, after the spill for a follow-up for his surgery, but did mention the spill to him.
- 23-25 They look at some maps showing the area where his house is located and some of his neighbors.
- 26-29 At the time of the spill, he was still laid up recovering from his surgery. It took him a long time to

recover and he lost a lot of weight. He heard about the spill from his granddaughter who knew someone in Northwoods who was being evacuated.

30 He was not evacuated from his home and did not go anywhere because he had nowhere to go.

30 The smell was like a mixture of chemicals, a "bug spray" kind of smell. He did not notice the smell until he went outside.

31 About a week after the spill, his daughter called the hotline. Someone came out to talk to them, but did not offer a hotel room or anything else.

33-35 He smelled the chemical smell pretty much constantly for two months and when it rained the smell would get really bad. He also smelled it when they were doing dirt work. He says he still smelled it up to a year ago if he goes to the back of his property where he will get a whiff every once in a while.

35 He heard the work being done in Northwoods for about 2 months. He was never prevented from leaving to getting to his house, but he did not get out a whole lot at that time.

37 He experienced irritated throat and burning eyes after the spill. He had a rash here and there. These symptoms lasted for about 2 months. He still has sore throats and allergies that he never had before the spill. He was never allergic to poison ivy, but now if he goes near it, he gets it.

40 He last had a sore throat about a week ago. He does not know how it could be related to the spill, but it started after the spill.

41 They review some of his medical records. The first is for a follow-up visit in 2012 to his primary care physician after his surgery. He was having trouble with his feeding tube.

43 He drinks 2-3 beers a day and occasionally smokes marijuana.

44-46 The next visit is November 14, 2013, after the spill. This was also for a follow-up visit. His record says he was a heavy smoker at that time, but he says he doesn't know where the doctor got that from. He was seen for hives at that time.

47-50 He was seen at UAMS in July 2013 for a follow-up for his amputation and vascular disease. His record states he smoked for 50 years, but he says there is no way he smoked for that long.

52-54 He did see oil in a ditch while driving around 2 or 3 days after the spill. He also saw them putting booms out in the lake.

55 No one did any air or soil testing on his property but he see someone testing at the church text door to him.

56 He was not allowed into the area by the easement on his property so if the oil was there he could not have seen it, but he says he knows it was there because he could smell it. He thinks the oil may have leached up underneath his property.

57-58 He is concerned about the property value going down, although he does not currently own the property but says his mother intends for him to inherit it.

59 He estimates the distance from his property to the spill is the length of a football field.

59 He usually did not turn his air conditioner on until June, but after the spill he says he kept his windows closed and ran the air conditioner to exhaust some of the air out because of the smell.

60 The noise and lights from the cleanup went on for months and months, all through the night.

60-62 He noticed there was not as much wildlife and birds on his property after the spill.

62 He has been fishing a few times, but does not eat anything he catches because of the spill and other septic runoff.

64 Some of the houses near him have been torn down.

DEPOSITION SUMMARY OF KATHRYN CHUNN (6/21/16)

Pages

5 DOB: 1/30/53

5 Current address: 38 Ledrick Circle, Mayflower, where she lived at the time of the spill in March 2013.

7 She is claiming damages for her property on Ledrick Circle.

9-11 They look at a map and discuss how to get to her house. Her fence backs up to Northwoods, which is the area where the spill occurred.

12-15 They look at additional maps and identify her house.

15 She does not know whether any oil flowed onto her property. She is not aware of any cleanup activities occurring on her property.

16-17 She did not miss any work. She did go to UAMS Family Clinic soon after the spill for a persistent cough, irritation in her throat and nose, headaches, and an occasional nosebleed.

18-21 She still has a cough and headaches on occasion. She also occasionally vomits, the last time about a week and a half ago. She does not know if the headaches and vomiting are associated to the spill, but she does think the cough is. No doctor has told her this.

21-22 Discuss education

22-25 Previously married three times, one child.

25-28 Not currently employed. Last worked teaching school at Mills High School in Little Rock in 2008. Prior to that, she taught school in Helena. Prior to that, she worked as a social worker in a nursing home for about 5 years. She taught school for a total of 23 years.

29 She was hurt while teaching in 2008 with a head injury and eye injury after being assaulted by some kids. Her retinas were ruptured and she had stress cataracts.

31 She has never smoked.

- 31-34 They discuss day of the spill. She was at home doing housework. She describes leaving her house and seeing police blocking the road and a man in a ditch with a shovel. Her throat and nose stated burning and she could smell what she thought of as a familiar smell from chemistry class and she knew there was a problem. It smelled like benzene to her.
- 35-41 She stayed at her ex-husband's apartment the next two nights and returned home on Sunday. She returned home but the smell was still there so she went back to his apartment. She did not return home to stay until she believes September 12, 2013. She stayed different places. She also left again when the houses in the Northwoods neighborhood were taken down. She returned for good around Thanksgiving.
- 41-42 She returned daily to her home but says she could not tolerate it and would just cough and cough. She always had the cough, but it was aggravated more when she returned to her house. She also vomited often because of the coughing. Her cough is worse when it rains.
- 43 She contacted someone at Exxon. She told them about her difficulty in living at her home. They did not offer to put her up anywhere, but they did give her \$3,000.
- 43-44 She does not know if any air testing was done at her home. She does not remember if she requested any be done. She does not recall that air testing was scheduled for her home, but that she cancelled it.
- 44-48 She thinks the \$3,000 was because she was displaced. They look at a copy of the check. It says it is an "Advance on expenses." She had called an 800 number at Exxon prior to receiving the check. She describes what expenses she thinks the check was for.
- 49-52 She describes condition of her property and problems she has had with trees dying, but then says that them dying is probably not relevant.
- 52 She has only had the one visit to the doctor right after the spill for her persistent cough. She used a lot of OTC medicine and cough drops.
- 53 The smell dissipated and she cannot remember when she last smelled it, but it may have still been there in the early part of 2014. However, when it rains now there is a funny smell that stays in the air.

55-58 They look at a report from testing of her neighbor's house on April 6, 2013. She is not aware her neighbor's house had been tested. They tested the constituents of crude oil inside and outside her home and found no detections. She does not recall anyone from Exxon or the EPA contacting her about testing her home and that she canceled the air test scheduled for April 2 to go to a doctor's appointment.

58-63 They discuss the purchase of her house. She has not had it appraised since the spill and has not tried to sell it. She believes the value of her house has decreased since the spill.

64-73 She saw oil from the spill from her neighbor's yard. She saw a sheen on the lake. She saw booms in the water.

73 She read about the University of Arkansas doing some testing along the coastline. She is not aware of any testing for crude oil constituents in Lake Conway.

73-77 She thinks she may have seen oil in the ditches near her house. She is not sure if she saw anyone performing any cleanup.

77-80 She describes how she was personally affected by the cleanup activities, such as by traffic and curfews and the noise from the trucks and the cleanup.

81 She likes to fish in the lake. She probably fishes more now than she did before the spill.

82 She originally filed a lawsuit a week after the oil spill, but does not know why her name was withdrawn from that lawsuit.

84-87 Her back fence is three and a half blocks from where the oil spill was. There is a drainage ditch right behind the fence.

87-88 She smelled the smell from the spill both inside and outside her home. She describes how she had to throw clothes and other items away because she could not get the smell out of them.

88 She had a thyroid biopsy for a benign nodule in January of 2013 and was told to avoid perfume.

- 89-90 She describes how she is not comfortable with items in her home and how there were experts that came in to talk to them.
- 90-94 She talks about changes in her yard and how she no longer will have friends over because she is afraid they will be harmed. She has long-term concerns about living there.
- 95 She describes why she thinks her cough and headaches are related to the oil spill. She never had one like it before the spill.
- 96-97 She tried to go back to her house each day, but could not stand to stay there.
- 99 She does not think she was offered by Exxon to be put up in a hotel.
- 101-102 She has type 2 adult-onset diabetes and is on insulin. She was treated for anxiety and depression after 2008 incident and now has PTSD and occasional panic attacks.

DEPOSITION SUMMARY OF KENNETH HOBBY (3/31/16)

Pages

7 DOB: 5/19/82

8 Current address: 60 Ledrick Circle, Mayflower since 2011

8 Married with no children

9 They look at Google maps with location of his house.

11-15 Currently works at Kimberly Clark as a maintenance technician since January of this year. Prior to that, worked at the Capitol Hotel managing the maintenance department for 8 years. They discuss other prior employment.

16 No other lawsuits. No military service.

17 Quit smoking in 2012. Smoked half a pack a day for 2½ to 3 years.

17-23 Describes health as good. Runner. He also does Cross Fit. Has a ski boat that he takes on the lake. He also kayaks.

23-26 Has a regular doctor and has also seen a urologist once and is supposed to go back for additional tests. He went to see his doctor in April 2013 for a checkup. He was fine except for his cholesterol was a little high; takes Lovastatin.

26-27 Had a bone tumor from a football injury at age 14. No chronic medical conditions.

28-37 He first noticed something was going on the day of the spill when he left work and was heading home. He noticed the smell. He described what he saw going on. He saw oil running down the ditch.

38-40 He saw people in his neighborhood taking pictures and passing out flyers. There were no cleanup workers or trucks in his neighborhood.

40 They were not evacuated.

40 He never saw any oil on his property.

40 The smell was a diesel smell. It was a very powerful smell and he had to roll the windows up in his truck. When he got home the smell was more intense than it had been on the interstate driving home.

42 He could also smell it inside his house but it was not as strong.

42-44 The really intense smell lasted a solid month and by summer there was a little bit of a hint of smell. He last smelled it last year when they were out running in another area.

45 They stayed at home that first night.

46-53 He describes activity in the area related to the cleanup that caused delays and disruptions for them.

53 He did not have any contact with anyone from Exxon and did call not call the claims line.

54-55 They discuss the purchase of his house. They are worried that the value has diminished since the oil spill.

56-59 He saw some information on air sampling on the Arkansas Department of Environmental Quality's website. He is not aware of any soil or water testing on his property.

60 About a week and a half after the spill he got a blinding headache with spots in front of his eyes and had to lay down. When he woke up the next day he was okay.

62 When he went for his checkup he did mention to his doctor about the headache from smelling the fumes. His doctor told him she did not think there was any big risk to the oil spill unless you were actually handling the oil spill like the cleanup workers were.

63 He also had a little nausea when he had the headache. No other symptoms.

65-68 They review the medical record from his visit on April 25, 2013 to his doctor for his checkup. There is no documentation of his headache.

68 His next visit to his doctor was in August 2014 for a yellow jacket sting.

- 70-72 He saw a urologist in December 2015 for a physical exam and fertility test. No physician has told him that their fertility problems are from the oil spill.
- 73 He likes to fish and has fished in Lake Conway, the last time prior to the oil spill.
- 75 He has not seen any data or test results that indicate that the main body of Lake Conway was adversely impacted by the oil spill, but he still has concerns.
- 76-77 His attorney asks him more questions about his fishing.
- 78 He is concerned about their ability to conceive and is concerned about the oil spill having something to do with it.
- 79 He thinks oil got on his property at least through the air.
- 80 He talks about the cleanup workers and the lights.
- 81 He is concerned about the future and their ability to start a family and his property and health.

DEPOSITION SUMMARY OF KIMLA LEMMONS-GREENE (3/21/16)

Pages

7 Address: 41 Ledrick Circle, Mayflower

7 DOB: 1/18/67

9 Two children

9-13 Lives in Ledrick Place which is south of the Northwoods Subdivision where the oil spill occurred. They locate her house on Google Maps.

14-20 She cannot say she saw any oil from the oil spill, but anytime there is precipitation she will see an oil sheen on the water in the drainage ditch and other bodies of water. She took photographs of this and dead crawfish.

20-23 There was air quality testing done around her home and it was determined that the air quality was below the standard, so she was able to return to her home. There has not been any soil testing. The test results reported no detections of crude oil related constituents inside or outside the property.

24-26 None of the homes in Ledrick Place were evacuated by the authorities. She was not home on the day of the oil spill and did not return until the next day. She only went to pick up some things. She was staying in Little Rock at a hotel.

27-29 Discuss her education.

29 No military service.

29-31 Divorced, two children.

31-36 Currently disabled, was full-time student at time of oil spill. Her disability is related to postpartum cardiomyopathy. She had a pacemaker implanted in 2009. She was a respiratory therapist at the time of her disability. She has also worked as a mortician. She never had any issues with the chemicals she worked with as a mortician.

36 Prior lawsuit against Dollar Store after tripping and falling going into store; had neck, back, and knee injuries.

38 Broken leg in severe car wreck in 1998.

39 Filed a lawsuit against Exxon on April 5, 2013, but lawsuit was dismissed.

42 Does not smoke.

43-44 Had asthma as a child with severe problems early in life. As she got older problems dissipated until the oil spill in 2013 when she started having problems again. Prior to the spill, she had rescue bronchodilators, but rarely used them. She says she had them due to her heart condition.

45 Diagnosed with chronic pancreatitis in 2002.

46 Currently being treated for anxiety and depression starting when she was divorced in 1999. Takes medication off and on.

48 Had back and neck injuries in another car accident in 2012.

49-51 On the day of the oil spill she was out shopping with her children in Little Rock. Her neighbor called her later that evening while she was out and told her about the spill and told her that she couldn't go home. She stayed at La Quinta Inn in Little Rock that night.

52 She went to the town hall meeting the next morning. During the meeting, she became extremely ill, nauseous, had difficulty breathing, and lost her voice. An Exxon representative at the meeting told her to go to the nearest emergency room.

54 She describes going into Mayflower that morning. There was a horrendous smell maybe a mile or two before the Mayflower exit. She passed where she would turn off to go to her house, but says it was blockaded, so she went onto the high school where the meeting was being held.

56 She describes smell as a heavy chemical smell that was breathtaking, worse than any embalming chemicals she had used in the past as a mortician.

57 They discuss who was at the meeting. At the meeting, she asked how the spill would impact people with preexisting health conditions and whether it was safe

for them to return to their homes. She had to stop asking questions because she was starting to lose her voice.

59 She left the meeting and stopped at her house to get her inhalers. She did not see any cleanup workers at that time. She was there only long enough to get her inhalers and then went to the emergency room.

61 At the emergency room she had several updraft treatments and was given a prescription for a bronchodilator. She thinks the doctor told her to stay away from the area of the oil spill because it was exacerbating her asthma so she returned to the La Quinta Inn.

63 She did return to her house that Sunday night to get clothes. She did not see any cleanup activity going on in her neighborhood. The smell was horrendous. They went to an extended stay hotel.

66-69 In April she had an acute gallbladder attack and had surgery on April 25, 2013. She then returned to the extended stay hotel after discharge from hospital. She explains why she thinks this could be related to the oil spill, because she had one neighbor who also had the same thing happen after the spill, without warning, and another neighbor who had some kind of cancer related to his gallbladder.

71-73 They review medical record from her gallbladder surgery.

74 She and her children tried to return to their house, but her daughter immediately got sick and had to go to emergency room.

75 She only returned to her house on a few occasions before returning for good on May 4. There was a chemical odor throughout her home. The more she cleaned, the worse the smell got. She cannot recall if she smelled any remnant of the oil spill outside her home.

77 Anytime there is any type of precipitation, there is a strange odor in the air. The last time was the previous week when it rained. She says she can smell something strange, but cannot definitively say if it is oil. The smell in the air is not the fresh air she was accustomed to prior to the spill.

- 77 She thinks she has become accustomed to the smell in her home, but other people who come in notice it. A friend who came in 2014 became somewhat nauseated and did not feel well.
- 79-86 She was reimbursed for her hotel bills, meals, medical expenses, and food items. They review a letter listing what she was reimbursed for.
- 88-93 They discuss her house, when she bought it, etc. She attempted to sell it after the oil spill by putting a sign in her yard. She has not had house appraised but feels the value has most definitely gone down since the oil spill.
- 95 She thinks where she lives is a toxic environment. She has not seen any testing, but knows what her body tells her and every time there is any type of precipitation she gets sick.
- 96-118 They review numerous medical records that they have not already discussed since the oil spill.
- 119-126 They review her daughter's medical bills related to the spill. Her son did not have any.
- 127 She is concerned that the pipeline was leaking before it actually ruptured and is worried about how that might have affected her and her children.
- 130-132 They review additional medical records for her that were prior to the oil spill.
- 133 Her property is maybe 3,000 feet from where the pipeline ruptured.
- 134 Oil from the spill touched her property through the drainage or runoff ditch.
- 135-138 They again review series of events after the spill. They also discuss what she saw and heard during the cleanup activity.
- 139 She returned to her home on April 4 when they did air testing. She disagrees with comment by tester that there was no odor present.
- 141 She made several trips back to her home between April 4 and when she moved back on May 4.

142 She noticed the odor on her furniture, clothing,
bedding, curtains, and anything that was porous.

144 Even though she was told it was safe, she still had
concerns because of the smell and how she and her
children felt when they returned. The cleanup was still
going on when she returned in May and she was concerned
that the even workers not working in the Northwoods
subdivision were wearing protective gear.

145 When she turned on her air conditioning the smell was
overwhelming.

146 She is worried about her property value, damage to the
environment or ecosystem in the lake, and about the
wildlife. She is worried about her children playing
outside.

148 They do not drink any of the water in the area. They
only drink bottled water now.

148 She is worried about the long-term effects on her
children. She believes her house is a toxic environment
and that it is killing her, which is a constant anxiety
for her.

150 She is concerned she saw dead animals. She saw several
dead birds around her door step.

151-156 They discuss her medical problems again and how the oil
spill has affected her and her daughter.

DEPOSITION SUMMARY OF LOLA MATTOX (3/28/16)

Pages

8 DOB: 2/18/53

8 Address: 58 Snuggs Circle

9 Moved to Mayflower in 1975 with first husband. Then
 remarried same year.

12 Two daughters

13 Worked as a truck driver.

14 Originally lived across the pond from where they live
 now. Marks on map where she currently lives and where
 she used to live. They moved to their current location
 in 1993 or 1994.

16-18 She stopped working in 2000. She became disabled as a
 result of hepatitis from a blood transfusion during a
 hysterectomy in 1978, and has had a liver transplant.

19 Names relatives in the area.

20-29 They review list of medications she takes and what she
 takes them for and doctors she sees. Takes Rapamune, an
 anti-rejection medication, Prozac, Uloric for kidney
 problems, Dexlansoprazole for her stomach, Lunesta,
 levyothyroxine, metoprolol, Xarelto, Simvastatin,
 Triamcinolone for a rash on her legs, and vitamins.

31-32 Shoulder surgery in 2014 for torn rotator cuff, back
 surgery, hysterectomy, part of her rib removed when she
 had MRSA, and a brain bleed related to her liver
 transplant.

33-35 Hospitalized many times.

37-43 She first noticed the smell on the day of the spill.
 Her daughter then went to town and saw the activity and
 called and told her about the oil spill. She talked to
 her neighbors about it and to her son-in-law. He showed
 them an aerial view of the spill and how close the oil
 was to their property. He told her it was 600 feet from
 their front door. They were not able to see the oil.

- 43-45 She spoke to her brother-in-law. He was sick and was wearing a mask. He told her he had the worse headache he had ever had and his nose was bleeding.
- 47 She says she went pale and got sick to her stomach and told her husband something was wrong. She has had sinus problems ever since. Before then, she very seldom had a sinus problem. She has been to the hospital more than once since then because of a sinus problem. She did not vomit. The nausea lasted 45 minutes.
- 49 She also had a headache. She called her coordinator at Mayo Clinic and was told to wear a mask and to not breathe the chemicals.
- 50 She still gets a headache if it is real hot in the summertime and the smell of the oil comes back. She used to get headaches very seldom and now gets them more often.
- 51 No doctor has told her that her sinus problems are related to the oil spill.
- 53 They stayed home that night. They were afraid to leave their house. They did go out a few days later to try to see where the oil spill had occurred but it was blocked off.
- 54 The cleanup workers were there for 2 or 3 months.
- 55-57 Their road was blocked off at times when they were replacing the pipe around the corner from their house. She was always able to get to the store so she is not certain about whether the road that leads to the interstate was ever closed.
- 58 They gave their daughter the property they live on back around 2003.
- 59-62 They review medical records. The first is from a visit on October 13, 2014 to Dr. Greenwood. The record says she was being evaluated for headache that onset approximately 3 weeks before and for snoring. She says she never went to her doctor strictly for those reasons. Her doctor thought her symptoms were related to her sleep apnea. She had a sleep study and was told she need to use a machine for her sleep apnea, but she says she doesn't need one of those.

63-67 Next is a progress note from August 2014 for a followup visit after her shoulder surgery because of pain related to a problem with the nerve block done after her surgery.

68-69 Next is a visit from August 7, 2013 to Dr. Greenwood for a cough and respiratory symptoms. Because of her liver transplant, she goes to the doctor any time she suspects she might have an infection of any kind.

70-71 Next is a visit from April 4, 2013 for diarrhea for the past 4 days. She says this happens often as a side effect of the medication for her liver transplant.

72-75 She called the Mayo Clinic on April 2, 2013 for the diarrhea and low grade fever. She says she called them many times after the spill.

75 She did not attend any of the community meetings.

76-78 She did call the hotline a week or so later about their concerns and was told to get a hotel room, but she says they could not do that because of their animals and that the person she spoke to acted like he was angry.

79 There was never any air or soil sampling done on their property. She has never requested this be done either.

80-81 She describes what they use their 20 acres of land for. At the time of the spill, they had cattle, horses, goats, and dogs. She was very concerned and worried about them at the time of the spill. They no longer have the cattle at this time.

81-83 They used to have fish in the pond on their property, but she does not think they do anymore because no one fishes there. They will not let their grandchildren fish from the pond. She has seen turtles and snakes, but not as many as prior to the oil spill. They used to have a lot of hummingbirds and wild ducks, but now they don't see any.

84-85 They have four dogs. At the time of oil spill, they were coughing a lot and they would go out and eat grass and then throw it up, which they did not typically do before the oil spill. She gives her dogs tap water.

85-86 She does not drink the tap water because she says there are chemicals in it. If she leaves a bowl of water in her sink all day, when she goes back there is a film on

the water, which she blames on the oil. She used to drink the water, which they filtered, prior to the spill, but will not now.

- 87-88 They review when she spoke to her coordinator at the Mayo Clinic the day of or day after the spill and that they told her not to go outside and breathe any fumes or to wear a mask if she goes outside.
- 89-91 She describes the spring time around her house prior to the oil spill and how things changed after the spill.
- 92-93 They again discuss the visit to her doctor in October 2014. She says the primary purpose of the visit was not for headaches and snoring. She says she was there for blood work.
- 94-96 She describes how one of her trees that was planted years ago died after the oil spill. Nothing in their community is the same anymore.
- 97 They discuss disruptions from the cleanup activity.
- 97 She is worried about her and her husband's long-term health and she worries about her animals.
- 99-100 They discuss why she thinks the film on her water is related to the oil spill.
- 100-101 She had someone from the tree nursery come and look at her dying tree. They told her they did not know what was wrong with it.
- 102 When her dogs go out and run in her yard they come back with black feet.

DEPOSITION SUMMARY OF MARGARET ROBERTS (4/1/14)

Pages

- 6-11 She notes several times in her husband's deposition taken earlier that she does not disagree with, mostly about dates.
- 12 Her parents lived next door to her on Meadowbrook Loop. Her father was dying of pancreatic cancer at the time of the spill. She does not in any way feel this was related to the spill.
- 13-15 They discuss a good friend of hers, Ellen Burgess, who rents a home from them on their property.
- 16 DOB: 6/4/58
- 16 In the last 10 years has been hospitalized for lap band surgery for morbid obesity and two back surgeries.
- 18 She recently left her job of 2 years working in a tobacco store. Prior to that, she worked for the telephone company for 30 years.
- 19-23 Diagnosed with fibromyalgia 4 years ago and takes Cymbalta. She is also on Prozac, Lexapro, Soma, muscle relaxers, hydrocodone, diazepam, and trazodone.
- 23 She smokes about half a pack a day of cigarettes. She drinks 2 glasses of wine a night. No illicit drugs.
- 24 Married four times.
- 25 Two brothers and mother live in area.
- 28-34 She describes the day of the spill. She was returning from the grocery store and saw a man looking at the cove. He did not stop her. After she got home, she noticed people going toward the cove and smelled the fumes that gave her a headache. It was very strong and made her eyes water. She went back home and watched the news.
- 34 For 3 weeks they had diarrhea and vomiting.
- 34 During the time from April 1 to 10, she was spending a lot of time at the hospital with her father. She would only have symptoms when at home. She did not return home every night.

36 The smell became more tolerable after the 3-week period.

37-40 She saw her doctor, Dr. Roberts, at least a month after the spill for her symptoms. She took OTC medications in the meantime. Her doctor gave her an antibiotic.

41-45 She describes other property concerns she has that she relates to the spill, such as no ducks like they used to have. They have also had to stop having fish fries because no one will eat the fish from the lake. She is not able to enjoy her property and other activities like she used to.

46 Her husband occasionally gets a whiff of oil in the air, but she says she can't smell anything most of the time.

46 The air boats are out every day and are very loud. She does not know what they are doing.

47-53 She just wants everything to be the way it used to be. It is not the fun place it used to be. She is not convinced the water is safe to fish from. She has seen oil on her property and a sheen on the water. She has not had any water testing done around her home and no air sampling.

56 She believes there is tar sand in the Lake Conway because it was found in the cove.

57-58 She has not tried to sell her property and does not know if it worth less than before the spill.

59 She wants Exxon to do the right thing and put everything back to normal.

61 She believes the spill has adversely affected the value of their property.

62 She saw a duck with oil on it with a week of the spill.

63 She does not think she will ever eat any fish out of the lake again. She does not think the fish will ever be safe to eat unless they drain the lake, remove some of it, and put fresh water and fish in.

DEPOSITION SUMMARY OF MARSHA COCHRAN (8/5/16)

Pages

7 Current address: 3011 Twilight Cove, Bryant, Arkansas

8 DOB: 8/10/48

8 Divorced

12-18 Gives work history. Currently works doing customer service and logistics for De Wafelbakkers.

21 Has two children

22 Remarried and now widowed

23-31 They review her husband's job and places they lived. They lived in Mayflower at 3 Leona Lane from 2005 to 2014. They discuss the house, what they paid for it and sold it for, what improvements they made.

32-33 She names relatives in the area.

34-36 Her husband filed bankruptcy for his business and she was part of that.

38-39 She takes half of a citalopram a day for anxiety and stress and half a Trazodone to sleep. They discuss her primary care doctors she has seen.

40 No medical conditions that require medication on a regular basis.

40-45 Gets bronchitis that sometimes turns into pneumonia. Had a bad bout of bronchitis in 2014 and had to take several antibiotics and steroids.

46-49 Now has COPD and scarred lungs from the bronchitis. She found this out when she went to a screening at a clinic.

49-53 Started smoking in 1974, quit and started smoking again several times, and finally quit for good in 2000.

53-55 She never went to the hospital for her bronchitis or pneumonia. She would go to her family doctor.

56 Has had hysterectomy. Hospitalized one night after foot surgery.

57 She first knew about the oil spill when she stepped outside and smelled a smell.

58-59 Identifies home on maps.

60 Smell was terrible and overpowering.

60-62 She called her son who told her about the oil spill and told her not to go back outside. She stayed home and was not evacuated.

62 She had a headache that night. When outside it was hard to get a breath. When she went back inside, she was able to breathe normally.

64 She did not have any trouble sleeping since she was taking her pills mentioned above back then.

64 She does not remember whether she still had a headache the next day. She did go outside and still smelled the oil.

66-70 She went to church on Sunday. She describes route she takes to get there. She recalls what she saw when driving through town.

70-72 She describes route she takes to get to work. It took a little longer to get home from work after the spill because of increase in traffic.

72 Other than the trouble breathing when she was outside, she did not have any other symptoms except the headache. She thinks she probably had the headache for several days but got used to it. It was not debilitating and did not make her feel sick to her stomach.

73-78 She thinks her problems now are related to the spill because of the bad bout of bronchitis she had and now her lungs are scarred. She recently had a complete work-up and her doctor told her that from what she can see on the x-rays it looked like she had "shattered glass syndrome." She went and had a CAT scan and was told she had scarred lungs and was told there was nothing they could do about it, but doctor said it was good news because it was only scar tissue and not the shattered glass syndrome.

79-84 When she an x-ray earlier, her previous doctor never mentioned any problem with her lungs. So she believes the scarring must be from the bronchitis in March 2014, which she thinks was brought on by the oil spill, and explains this in detail.

85-86 She says her doctor told her that the oil spill contributed to her bronchitis and pneumonia.

88 She believes her property value went down as a result of the oil spill.

89 The smell was bad for about 2 to 3 weeks and then was off and on according to when the wind shifted for probably another 6 to 8 months. She thinks she noticed it more than some people because she left the area to go to work and then returned.

90 She was not disturbed by the light or noise. It prevented her from going outside to work in her garden for 2 to 3 weeks and kept her from going downtown for probably a month and a half.

91 She never saw any oil on her property. She does not know if any air testing was done on her property.

91 She never called the claims line and never talked to anyone from Exxon. She never went to any community meetings.

92-96 They discuss when she sold her house and moved and whether she was there when the tornado hit in 2014.

98-100 She is asked specific symptoms from her attorney and whether she experienced any of them, other than the headaches. She did have allergy symptoms around that time, but until now did not associate them with the oil spill.

101-103 She describes disruption from the increased traffic and trying to get around town. She saw cleanup workers wearing hazmat suits.

103-105 She indicates on a map where she saw oil.

105 She saw the booms in the water. She did not see any dead animals, birds, or fish.

DEPOSITION SUMMARY OF MELISSA HAYS (3/30/16)

Pages

- 9 DOB: 8/26/80
- 9-17 They review education and where she has lived. They moved to Mayflower in 2007. She has not worked since they moved there.
- 18 Married with no children
- 19-25 Takes Zoloft, clonazepam, and hydrocodone for anxiety, obsessive/compulsive disorder, and depression. They review doctors she has seen. She takes the hydrocodone for migraines and has been followed by a pain specialist for 3 years. She also takes naproxen for arthritis in her hands.
- 26-27 Had cyst removed from wrist in 2006 and adenoid surgery as a child.
- 27 Smokes pack to a pack and a half for 9 years. Does not drink alcohol. No drugs.
- 28-29 She applied for disability in 2014 and was rejected; has hired a lawyer. Her disability is related to her migraines and anxiety and says she has a mental function problem. She cannot handle pressure.
- 30 She first learned about the spill when driving to the grocery store and she started to smell a bad odor which gave her a headache and she started to feel nauseous and dizzy. This was around 2:00 in the afternoon.
- 32 The smell started getting worse. She did not see anyone working on the oil spill on her way home.
- 33-36 Her symptoms started to get worse the next day. She vomited. She started coughing and wheezing. She did not take any medications for her symptoms.
- 36 Her husband came home later that night and started to have the same symptoms.
- 38-41 The next day the smell was worse and was getting into the house. She thinks the oil got onto their property. She locates their house on a map and draws a line where the ditch is located where she thinks the oil was that came onto their property.

42 She didn't see any oil in the ditch but thinks that when it rained the oil ran into the ditch.

43 She is not aware of anyone taking any samples from the ditch or any pictures of the ditch.

43-45 They stayed home that next day. They talked to the neighbors about what was going on.

47-49 She felt like her headaches were getting worse. She does not think she had started taking the hydrocodone yet for her headaches.

54 The next week her symptoms kept getting worse. There was a lot of noise from the cleanup and she was having trouble sleeping.

55 She saw a doctor about a week or so after the spill for her headaches and respiratory issues. She went to Mayflower Medical.

57-61 She went to her primary doctor, Dr. Simpson, about 4 or 5 months after because she was still having these symptoms. He also gave her antibiotics for an infection, but she says her symptoms continued. Her symptoms started to clear up she says going into the next year.

62 She says she thinks the doctors she saw thought the oil caused her symptoms, although they never told her that.

63-69 They review records from three visits to the Mayflower Medical Clinic. The first visit was on April 11, 2013. Record says she was there for a head cold and lists a long list of symptoms. They review medications listed.

70-72 Next visit was on April 18, 2013. She was still complaining of a head cold that had been going on for 3 weeks. It lists symptoms and medications she has already tried taking.

73-76 Last visit was on June 18, 2013 for acute sinusitis. Record says has had problem for 1 to 2 days and that it is an acute problem without chronic or recurrent episodes and lists her symptoms.

76 States she is still dealing with migraines that are not going away and she feels are related to the oil spill.

- 77 She is also more depressed since the oil spill because she feels the neighborhood is not like it used to be and she feels her property value went down. She no longer trusts the water and will only drink bottled water.
- 78-81 She thinks Lake Conway is still "infected" because her husband used to fish there every weekend and now goes somewhere else. She just does not believe that the lake is clean even though she has read that the lake is clean and it's safe to fish, because she still sees a boom out in the water blocking off a certain area.
- 82-83 They have city water and she believes the oil got in the water because "it spilled all over the place."
- 83-87 The ducks and geese stopped coming around. The birds and turtles have started coming back. They also used to have deer, but she has not seen any since the oil spill.
- 88 She has never spoken to anyone from Exxon and never attended of the meetings.
- 90 There has not been any air testing done on their property.
- 91-92 She described differences in her allergy and sinus issues before and after the spill.
- 93 She was originally prescribed hydrocodone for painful periods. After the spill, she was prescribed it for her headaches.
- 95-96 She has recently changed the doctor she sees for her anxiety and depression because her previous doctor is retiring. She thinks the oil spill made her anxiety and depression worse.
- 98-100 Her primary exercise is walking in her neighborhood. She stopped walking for a while after the oil spill because she didn't want to breathe the air.
- 101 The smell lasted at least a week, maybe two and then started to decrease, but she thinks you can still smell it a little bit here and there sometimes.
- 101 The smell was inside her house. She tried to get rid of it by spraying Febreeze, but it was just overwhelming.

102 The lights and noise from the cleanup went on for
months and interfered with her sleep.

102 She is concerned about her future health.

104 Her headaches just come and go now. There is nothing in
particular that triggers them.

DEPOSITION SUMMARY OF PATRICIA CLAPPER (8/3/16)

Pages

5 DOB: 1/27/70

5 Lives at 26 Dam Road, Mayflower with daughter.

10 No military service

11 Divorced

11-15 They review employment. Mainly worked in food service industry and sales. Currently works at Methodist Behavioral Hospital for Pharmacy Management Services. Not claiming any lost wages or missed time from work.

16 No other lawsuits

17 Takes Synthroid for hypothyroidism. Had one seizure as a child and was hospitalized.

18 Says not a smoker; will randomly smoke a few cigarettes with drinks.

19 They locate her house on two Google maps.

21-23 Has rented house at 26 Dam Road from Ellen Burgess since fall of 2012.

24-29 She first learned something was happening on day of oil spill when she was driving and smelled an overwhelming smell. She describes route from work to home and stopping to get groceries and what she saw going on.

30-31 She stayed at her house that night. She may have talked with the neighbors that night about the smell, but nobody knew what was going on. They discuss neighbors who live around her.

32-34 There was a lot of loud commotion going on that night in the cove area. The noise and smell disturbed her sleep. It was hard to breathe and she had headaches. She couldn't eat. She was never evacuated by any authorities, however, she did leave on her own for a few days.

35-38 She called the Game & Fish on Saturday because she had found some animals that were covered in oil. She thinks she was at home most of Saturday and Sunday trying to

help the animals. She describes animals she saw that looked to her like they had oil on them. She does not recall whether she saw any oil in the cove that weekend.

39 She and her daughter left for a couple of nights, but otherwise stayed at the house.

41 Her daughter had headaches, sleeplessness, trouble eating.

41-44 There is still an occasional smell after a good rain or just depending on the weather. She thinks she last smelled it a couple of weeks ago. It was overwhelming when she walked out the door, but at other times it is weaker. She does not recall when it started to lessen.

44 She did not seek any medical attention for any of her symptoms.

45-47 She cannot say when she last had a headache that she would attribute to the oil spill.

47 The nausea was random after the first weekend and she cannot say how long it lasted.

51 She describes activities at her home that the smell interfered with.

53-61 She describes cleanup activities she witnessed. She called the hotline a few times about problems she had and to complain about the noise.

61 Her biggest concern is the effects on the wildlife.

62-64 She believes she saw oil right near the water line on her property. She also saw oil down around the cove.

66-110 They look at photographs she brought with her taken in her backyard.

110 There was no work done on her property during the cleanup and she does not think there was any visible physical effect from the oil spill to the property.

111-114 They discuss her and Ellen Burgess's agreement of renting with a possible option to buy the house and that she believes the property value has gone down since the oil spill.

- 115-118 They review what she is seeking for damages and work that she has done on the property.
- 119 She has no knowledge of any testing done to the property. She did see what she thought was a truck going down the street that she thought was doing testing.
- 121 The oil spill has interfered with her outdoor activities.
- 122 There were people from Exxon who came by to check on them and gave them a pamphlet of information of what was going on at that point.
- 123 She has received \$2500 from Exxon.
- 124 She believes it is possible that oil did get into Lake Conway.
- 126-128 They review her daughter's symptoms and how the oil spill affected her.
- 129 She has two dogs and she noticed that one started wheezing real bad last couple of years since the spill.
- 132-134 She describes how the oil spill has affected her life.

DEPOSITION SUMMARY OF ROBERT MATTOX (3/28/16)

Pages

9 DOB: 4/23/51

9 Address: 58 Snuggs Circle, Mayflower

10-12 Last worked in June 2009 as a truck driver for Tyson Foods. Had to leave job because he had to go on oxygen and went on disability. Has been a truck driver his entire career and reviews previous employers.

12-14 Joined Marines in 1969. Review where he was stationed. Was in Vietnam for about 7 months driving a truck. Discharged in 1972.

14-16 No physical wounds from Vietnam but has had some psychiatric problems and is seen at the VA since 2009 for these problems.

16 Filed bankruptcy in 2002.

18 Related to many people in the area.

19-22 Moved to 58 Snuggs Circle in 1996. They review his past residential history.

23-25 Married with two stepchildren

25-31 He locates his house on map and some of his neighbors. He does not own the property his trailer is located on.

31-33 He was diagnosed with COPD in 1992 or 1993 and is now on oxygen starting in 2009. He takes Spiriva and Symbicort for his COPD, Prozac for depression since 2009, and Simvastatin for cholesterol since 2009.

35 He and his wife were at home that day and smelled an awful smell. Their daughter called and told them about the oil spill.

36 They were not evacuated.

37 His breathing started getting restricted like his throat was closing up, his eyes watered and were burning, and he got a headache.

38 They pretty much stayed home that weekend, except for maybe going to the grocery store.

39 The smell lasted for several months.

39 He went to see his doctor at the VA.

40-42 They called the county health department a week or so after the spill and were told to come in. They went there and were interviewed by a doctor about their symptoms and told to follow up with their own doctor, which he did.

43 His doctor told him to up his oxygen so he could breathe better and this helped a little.

44-48 He returned to his doctor 3 months later for a follow-up for his COPD and was still having the same problems. He asked his doctor if it would be a long-term problem and the doctor could not answer that. Both doctors did tell him that it was very possible that his symptoms were from the oil spill.

48 The smell lasted for several months and sometimes he can still smell it, but not as strong. It started to reduce in strength probably after 5 or 6 months because a lot of the oil had been cleaned up by then.

50-52 He went to the Northwoods subdivision for the first time since the spill about 6 months ago. He could see that a lot of stuff had been disrupted and where they cleaned up and that a couple of houses had been taken down. He could still smell the oil there.

53-56 His depression also increased quite a bit as a result of the oil spill because it disrupted their life. He had to increase his medicine a little over a year ago. He describes some of the disruptions.

56 His sinuses also bother him now more than they did before the spill.

57-58 He believes that the headaches he still gets currently are related to the oil spill because he gets them when he smells the oil.

59 He thinks his breathing has gotten worse since the spill. He used to be able to go for walks and now he gets out of breath too quick.

60-61 They are not able to barbecue like they used to. They just don't go outside as much as they used to because of worry that they will smell the oil.

62 He smoked from age 15 until approximately age 42, a little over a pack a day of Marlboros. His wife also smoked, but quit when he did.

64 The only factor in his history that he can relate to his COPD is his smoking. However, he is reminded about Vietnam and he says he hauled Agent Orange in his truck and agrees that could be a contributing factor.

65-67 He increased his oxygen from one liter to two a day after the spill to see if he could breathe easier. He did discuss increasing his oxygen with his home oxygen therapist. About 6 or 7 months after the spill, he dropped his oxygen back down to one liter for about 4 months and then had to increase back to two.

67-68 He describes the smell as a real harsh smell. He describes his reaction to smelling the smell.

69 He basically spent several months in the house other than short trips to store or doctor's appointment.

69 He did experience some nausea off and on throughout the time when the smell was strongest.

69 He also had dizziness that was real bad the first couple of months. He would also have dizziness with the sinus problems.

69-70 He believes his breathing has gotten worse because of it, the headaches and sinus problems have definitely been worse, his eyes bother him, the nausea is off and on, and the dizziness that goes along with the sinuses.

70-71 They deeded their property to his stepdaughter in 2005 because she was going to inherit it anyway. He is worried the value of the property has decreased.

71-73 The cleanup activity was disruptive with the noise and roadblocks, increased traffic, and lights and disturbed his sleep for a good 6 months.

75 He is concerned about the wildlife and environment.

75 They had their carpets shampooed and they washed their walls down to get the smell out of the house.

DEPOSITION SUMMARY OF RONNY STANDISH (6/22/16)

Pages

- 5 Lives at 52 Snuggs Circle, Mayflower
- 5 DOB: 7/12/69
- 7 She has brought in newsletters that were sent to the Mayflower community in April 2013. She also has a letter sent to her husband by a congressman.
- 9 At the time of the spill, she and her now ex-husband lived in the house. She is not claiming any damage to the property.
- 11 She is retired from the Air Force and was in from 1988 to 2008.
- 12-14 She is divorced with no children. She lists relatives in the area.
- 15 She had a few part-time jobs in high school and before going into the Air Force after high school.
- 16-17 After the Air Force, she took a 9-month break from work. She then went to work for Akal Security in 2008, a private security company contracted by the U.S. Marshall Service, working at the courthouse. She works as a court security officer.
- 17 She is not claiming lost wages. No other lawsuits or workers' comp claims.
- 18-24 On the day of the spill, she had the day off and was at home. During the day, she started getting a headache and congestion. She thought it was due to allergies. Her husband came home and they left to go to store to get medicine. They got caught up in traffic. She saw oil in a ditch. She describes how they followed a dump truck to Lake Conway and watched them dump sand over a culvert.
- 24 At first she thought the smell was from a natural gas leak, but then realized the smell was different, it was a burning smell.
- 26-27 The headache and congestion started around lunch time and this was before she noticed any smell. These were the only symptoms she noticed. They only lasted a

couple of days. When she returned to work on Monday, they were gone.

- 28 The smell was powerful and lasted into the summer.
- 29 They were never evacuated. They did not leave their house to go stay somewhere else. The smell lightened up over time.
- 30 She did not see a doctor for her symptoms. She is not making any claim for medical expenses.
- 31-33 She feels she lost use of her property as a result of the spill and describes how. They have 20 acres of land which is very close to the oil spill area. They have two wells and a pond on their land and she is very concerned about their water and their livestock. Her husband called the claim line twice and two different people came out to their property.
- 33 No testing was done on their property. They had a film of oil that eventually sunk into the ground.
- 34 She does not know if the oil affected her chickens, but she never ate any more of their eggs.
- 35-37 They look at a map of her property. She marks her property and places on her property.
- 37-38 She did not see any film on the pond on her property. But the pond has moving water through it. She has not detected any problems with the pond. However, she is concerned that there could have been oil in the pond. At the time of the spill, she had cattle that drank from the pond and two heifers had stillborn calves.
- 39-41 She describes her and her husband's concern about the spill due to their military first responder training and how situations like this are handled.
- 41-42 She again talks about cattle having stillborn calves and how odd that they both would at the same time.
- 43 They decided to cap off the two wells that they used for their animals, gardens, and other uses, because they did not know what happened to them.
- 45-46 She indicates on map where she saw the oil in the ditch.

- 47-70 She describes her claim for nuisance related to the spill. She thinks they should have been evacuated. She is concerned about her property value now. She was deeded the property by her parents, but describes improvements she has made to the property. She has had the property appraised several times when she has refinanced.
- 70-72 She talks about her concerns during the 2014 tornado, but this did not hit her property.
- 72-73 The Pegasus pipeline is not on her property. She describes how she saw signs that went up after the spill identifying where the pipeline is.
- 73 She did not request any air, water, or soil testing to be done on her property.
- 74 Her main concern is the water and wells on her property.
- 74-77 She has tried fishing Lake Conway and recently saw an Exxon buoy-type barrier still out in the water. She is guessing she is not having any luck catching fish because of the oil spill, but says she would not eat it anyway. She used to fish there a lot.
- 78-81 She was aware of the community meetings held in Mayflower, but did not attend any of them. She did talk with one Exxon employee who was in the neighborhood. They did have the two Exxon employees come out regarding the chicken coop, but her husband talked to them.
- 82 She has no knowledge of any oil getting into the main body of Lake Conway.
- 83-84 They discuss the property she lives on that her parents deeded to her and what she thinks has been the damage to the property from the spill.
- 85-88 She has had headaches and congestion since the spill. The headaches within the first few months of the spill were strong.
- 88-90 She explains why she is concerned that they were not evacuated. She is concerned about her future health.

- 91 She describes what happened when the man came out to examine the chicken coop after they called the claims hotline. He did not perform any testing.
- 93 They further discuss the nuisance to them as a result of the cleanup.
- 94-96 She describes her concern about her property value.
- 97-98 She feels she and her husband did what they were supposed to do as far as contacting the claims hotline, and she feels that their responses were not satisfactory, which still causes her concern.
- 100-101 They look at the documents she brought with her that they received in April 2013. One document states that although they smell an odor, current air quality readings are below levels likely to cause health effects with the exception of the cleanup areas where the emergency responders are directly working. This concerned her because the cleanup workers were working directly behind her property.
- 101-103 Another letter states that air quality monitoring continues by EPA and Exxon-Mobile separately and that data from the air monitors outside the immediate work areas continue to show levels that are either non-detect or that are below necessary action levels. She never went online to see the air data that was available.
- 105-109 They review additional parts of the letters she received in April 2013. They never actually asked to be evacuated, but she says her husband did call about their concern about their proximity and whether they should be considered for evacuation.

DEPOSITION SUMMARY OF SAMANTHA CHILDERS (5/16/16)

Pages

8 DOB: 4/6/90

8 Married with three children

9-18 They lived at 165 Highway 89 South at the time of the oil spill. She was pregnant with her daughter, Gracelynn. She says they lived there from January to April 2013, however, her medical records from that time list a different address starting with a visit date of January 27, 2013. She says they must have just not changed their address.

19-26 They locate the two addresses they have been discussing above on a map. They review where she has lived since then.

28 She worked as a CNA after high school, then at Subway, and then as a vet assistant. She does not currently work.

30 She missed work as a result of the oil spill. A couple of weeks after it happened her boss told her not to come back until after she had the baby because she was having contractions and was sick.

30 She was involved in a car wreck in 2011 and broke her hip, pelvis, and tailbone and shattered her wrist.

32-35 She filed for workers' comp about a year ago after hurting her back picking dogs up and that is when she stopped working. She currently is receiving treatment for that and for anxiety and depression and PTSD related to her childhood. She takes valium and Oxycodone and something for depression.

36 She smokes about a pack every 3 days.

36 She was at home on the day of the spill. She found out about it when she tried to go out to get food and had to turn around.

38 She had trouble sleeping that night because of the smell. She had a migraine that night.

39 They were never evacuated.

40 That weekend she started cramping and getting sick and went to the hospital.

42-49 Her children had symptoms and were seen the following week by their pediatrician. They used to fish in Lake Conway. She believes there was oil in the water of Lake Conway because she thinks the cleanup workers transferred water from the cove to the main lake. She is not aware that testing showed there was no oil in the main body of Lake Conway.

50-51 They moved to Jacksonville about two months after the spill and about five months later moved back to Mayflower. The oil spill did not affect them at all when they returned.

52-55 They discuss treatment her two older children had. Her daughter, who was born on May 14, 2013, has not needed any medical treatment related to the oil spill.

55 Her symptoms were migraine, cramping, vomiting, and upset stomach. The migraines occurred every day until they moved.

56 The smell lasted until they moved, although after a month it was not as strong.

56 She would have cramping really bad every few days until they moved and it slowed down until she had her daughter.

57 She vomited at least once a day for about a month and had an upset stomach every day until they moved.

58-61 She sought medical treatment for her symptoms.

62-72 They review and discuss some other medical records. She says there are differences in symptoms that she was seen for before the spill and then after the spill. She says the cramping she went for before was different than the cramping after the spill. She was also seen for migraines and headaches several times prior to the spill.

73-76 When seen on April 7, 2013 for coughing there is no reference in the record to the oil spill. She had another visit a week later for cramping and increased pelvic pressure and was diagnosed with a UTI. Again no mention of the oil spill.

77-80 They discuss when her boss told her to stop working and how long she was out of work. She is claiming lost wages for the additional time she had to take off.

82-83 She describes increase in noise and traffic due to the cleanup that was disruptive.

84 She is concerned about her and her children's future health.

85-88 She did not see any oil on the property she lived at. She describes where she saw it in the water.

89 There was no testing done on the property.

91-94 She was concerned about her baby. She had had miscarriages prior to having her. This caused her additional stress and emotional strain. She is still concerned it might cause her daughter some respiratory problems in the future.

95 She says she left Mayflower to get away from the fumes and keep her kids safe.

96 They discuss her older son's asthma and how he had to use his inhaler more after the spill until they moved.

97-98 She did see some dead animals and fish.

99-100 She describes how her headaches were worse after the oil spill.

DEPOSITION SUMMARY OF TARA WHITE (5/10/16)

Pages

- 5 Received pharmacy technician license in 2007 and worked at Central Pharmacy and then U.S. Compounding until December 2012 when she had her youngest daughter and did not return to work.
- 7 Married with two daughters and three stepdaughters.
- 11-14 Lives at 33 North Main Street, Mayflower, since 2011. Locates on a map. They discuss house and purchase price.
- 16-17 Claim related to inconveniences related to getting home on day of spill, noise and lights from cleanup workers, traffic, and symptoms she and her daughter had. Her other daughter was just an infant at the time.
- 17-18 She had headaches and nausea. Her 6-year-old daughter had very bad headaches from the smell. They could taste it when they ate.
- 19 She does not know what symptoms her 3-month-old would have had, but she is terrified about what could have been going on at the time of the spill. She was excessively fussy.
- 20-23 She had infrequent headaches prior to the spill but after the spill they became more frequent. She had a headache every day for at least the first 2 months. She then had headaches at least weekly and still has them. Her doctor told her since the headaches became more frequent at the time of the spill, she thought it was an environmental issue.
- 24-25 She describes how she could "taste the oil". This went on for a few months. This still occurs at times depending on the weather and sometimes being able to notice the smell again.
- 26 The smell started to go away towards the end of that summer.
- 26 The inconvenience caused by the cleanup workers lasted 4 to 6 months.
- 26-29 They discuss older daughter's headaches.

30 She took infant daughter to have her checked right after oil spill and doctor thought she appeared to be fine but there was no way to tell any long-term effects.

31 She saw a doctor shortly after the oil spill.

32 She has type 1 diabetes, hypothyroidism, seasonal allergies, anxiety, and exercise-induced asthma diagnosed as a child.

32-33 She was involved in an accident when an 18-wheeler hit her car on the freeway. She had neck and back pain and still has anxiety about driving on the freeway.

34 She was hospitalized in 2007 for diabetic ketoacidosis.

35 She uses a pump for her diabetes rather than shots.

36-39 She was out with her daughters at the time of the oil spill. She tried to get home but was not allowed to until she showed ID and they let her in, but told her she could not leave again that evening or she would not be allowed back in. She then found out more about what happened on Facebook.

39 She did not see any oil that day.

42 They had to show their ID for a few days.

42-45 She describes cleanup activity she saw.

45-46 Describes what work they have done to their house and when.

47 She had two dogs at time of the spill, but does not think they acted any differently.

47-49 Continues describing cleanup activity.

49 She never physically saw any oil on their property, but did see it in other places in Mayflower. However, because the smell was so bad she does not know if it somehow went into the soil on their property.

50-52 She saw oil in a drainage ditch and in Lake Conway where they had the booms.

53-54 They discuss other members of her family.

55 Back to discussing where she saw oil in Mayflower. She has seen oil sheen in the cove as recently as within the last year.

56 The smell subsided by the end of summer, beginning of fall, but she can still smell it sometimes depending on the weather.

58-60 She went to the doctor for her symptoms. They look at a record of visit from April 8, 2013. Record indicates she was experiencing headaches, but no nausea at that time.

61-65 They review a visit for her daughter.

66 They never left their home because of the smell.

66 She thinks the oil spill has decreased the value of their home.

69 They received pamphlets or flyers from Exxon. She was reimbursed for her co-pay for her doctor's visit.

71-73 She has friends who live in Northwoods subdivision and has been there since the cleanup.

73-75 They were not offered to be put up in a hotel, but says it would be too disruptive to their life to do anyway.

76 Prior to oil spill, she would take allergy medication as needed, but not on a daily basis. Since the oil spill she has had to take Zyrtec on a daily basis.

77 She is concerned about her daughter having multiple headaches after the oil spill and about her youngest being so young at the time.

79 They talk about the atmosphere around town, how everyone was very angry and terrified.

80-82 They moved to Mayflower because they thought it was a good place to raise a family. They have continued to fish but won't fish in Lake Conway. She has heard that Exxon did testing in Lake Conway and that they said there was no oil in the lake, but she says if there was no oil in the lake why did Exxon put the boom in the water.

83-84 They discuss where she saw oil in the lake.

DEPOSITION SUMMARY OF TERESA BULLARD (3/21/16)

Pages

8 Current address is 7516 Worth Avenue, Benton, since November 2014.

8 Married with one son.

9-13 She graduated from college and then moved to Little Rock for 2 years. At time of the spill, she was living at 6 Chardonnay Cove in Mayflower.

13 No military service

14 Currently works for Windstream for 2 years. Prior to that, she worked for Allied for 2 years and was working there at time of the oil spill. She is not claiming any lost wages.

16-18 Fairly healthy but still gets occasional headaches. Says headaches really started bothering her after the oil spill and she saw her doctor because of them. She relates them to the oil spill, although cannot say that her current ones are related to the spill.

19-25 Her doctor diagnosed her with migraine headaches and gave her migraine medication, some of which helped, and some of which she could not take. This was a month or two after the spill. This was the only time she was seen for headaches. She generally takes OTC medications now for her headaches.

25 On Synthroid for an underactive thyroid for 5 or 6 years.

27 Started smoking probably in college, 5-6 cigarettes a day, but stopped 5 or 6 years ago.

28 Drinks 1 to 3 beers a week.

28 Had a workers' comp claim after falling down stairs at Dillards and had a back injury.

29 She works as a senior graphic specialist.

30-38 She was driving home on day of the spill when her husband called her and said something was going on and she already knew because she could immediately smell something. She could smell it miles from her exit. She

describes her route home and what activity she saw. They look at some Google maps of the area and where her house was located.

- 38-44 She and her husband went to her parents for the weekend. They spoke to their neighbors about what was going on before leaving. They were home probably an hour or two before going to her parents.
- 45 While they were home during that time they could smell a very strong chemical smell inside and outside.
- 48 When she returned to her home on Sunday there was still a very strong smell. She remembers seeing oil being cleaned up on Route 89 and men in hazmat suits and oil everywhere in the ditches by the neighborhood.
- 50-52 The actual spill did not occur in her neighborhood, but she does not know if oil flowed onto her street or not. She did not see any actual oil flowing on her street.
- 53-54 She does recall two men who she thinks worked for Exxon coming to speak to them.
- 55 She thinks they stayed at their house that entire first week.
- 56-58 It took several weeks to a month for the smell to start gradually lessening. She cannot say whether she ever stopped smelling it before moving in 2014 because it kind of still lingered in the air a little bit every so often.
- 61 She describes issues and problems she had because of the spill. She had headaches and nausea. She worried about the long-term effects on them physically. They worried because they were in the process of adopting a child and were worried about bringing him into that environment. They could not enjoy hobbies like working in their yard or fishing.
- 62-64 She saw a doctor because she felt sick to her stomach, dizzy, and lightheaded, but does not remember if this was before or after the spill.
- 65-66 She has done research on the type of oil that was spilled. She has never asked her doctor about the long-term effects.

67-70 She describes what a home study is in the adoption process. They came both before and after the spill and did not express any concerns about the oil spill.

70 They found a few dead birds in their yard. After that she no longer wanted to work in her yard.

71-75 They both like to fish, but pretty much stopped fishing in Lake Conway after the oil spill.

75-79 They tried to sell their house in 2011, but the sale fell through.

80-85 They did sell their house in 2014 and moved to Benton.

86-87 She did not get close enough to the dead birds on their property to see if they had any oil on them.

88-90 There were times when she was concerned when her son, who is adopted and they got on August 1, 2013, would be sniffing or his breathing would be labored. She did take him to the doctor's for breathing difficulties and wondered if they were related to the oil spill. The doctor never said that he thought they were related.

91-94 They discuss a medical record of a visit she had to her doctor on June 14, 2013, when she was complaining of headaches and that she was under a lot of stress she says from the oil spill and the adoption process.

96-98 Another visit on July 9, 2013, when she had to have a physical related to the adoption.

99 At that visit it was noted that she was a "current every day smoker" and drank alcohol occasionally. She does not think she was smoking at that time. She thinks she stopped 5 or 6 years ago when they started trying to have children.

100-101 They discuss tornado in 2014 and how it impacted them. They did not have any damage.

102 They never had any air monitoring or soil or water testing done at their home.

103 Her husband attended a community meeting.

105-109 Medical record shows she saw her doctor for a fainting spell in 2011 and feelings of vertigo, but she thinks she also saw him after the oil spill for the vertigo.

- 110-113 Next medical record is related to her thyroid condition. It says in December 2012 she was still smoking 7 to 10 cigarettes. She says she cannot recall, but that she knows she quit smoking around that time. She thinks it is just that her smoking history has not been updated in her records.
- 113-116 She tells them why she and her husband moved to Mayflower. They thought it was an ideal setting to raise a family. They review the asking price of their house and what they sold it for.
- 117-120 They heard noise and saw people working on the cleanup from their home. This went on for weeks. She saw news media. They had to find alternate routes when the roads were blocked off. They basically discuss all the inconveniences they had from the oil spill and their concerns about the effects of the spill.
- 120-121 They again discuss when the smell was present and when it was finally gone.
- 121-124 Her medical record from her visit on July 9, 2013 indicates she was complaining of headaches and nausea. They discuss stress she was under due to adoption and oil spill. Under active problems on her doctor visit it listed acute pharyngitis, acute sinusitis, headache, and hyperthyroidism.
- 125 She had a visit to her doctor in December 2013 for an injection of betamethasone, which she believes was for migraines. She had an episode of 3 days when the headache would not go away and the shot was the only thing that really helped to ease it.
- 126 She is concerned about her health but does not know why she did not discuss with her doctor.
- 127 She believes oil got in the lake, although has no information that supports this belief.
- 127 She does not think it was her responsibility to have testing done on the air, water, or soil at her home.
- 129 She is concerned about her future health because she does not know what was in the oil that spilled that day.

- 132 They again look at December 2013 visit to doctor. Her chief complaint was sinus congestion, drainage, sore throat, and productive cough. No mention of headache that she had shot for, but she says those symptoms usually cause a headache, but the headache is different than a migraine headache.
- 133 Record also shows she is a smoker, but she again says she thinks the information was not updated.

DEPOSITION SUMMARY OF TYLER BATES (5/16/16)

Pages

- 6 He has a broken back with rods and screws in his back from a car accident in 2011.
- 7 Current address: 1035 Cole Drive, Jacksonville, where he and his family live in a trailer on his wife's grandparents' land.
- 7 DOB: 6/22/90
- 7-15 They review his addresses around the time of the spill in March 2013, because the information on where they lived is different from medical records. He says at the time of the spill they were living at 165 Highway 89 South in Mayflower.
- 16 Never served in military.
- 17 Married with three children.
- 17-18 They discuss relatives he has living in the area.
- 18-20 They review his jobs after leaving high school. He was not working at the time of the oil spill in March 2013. He started back working last year and works for a company that gets animals out of houses.
- 22 Other than his back problems, he also has allergies for which he takes hydrocodone and shots for his allergies.
- 22 He does not smoke.
- 23 He was at home on the day of the oil spill. They first learned something was going on when they were driving to the grocery store. They could smell something and when they got to bridge over Lake Conway near I-40 they weren't let through.
- 24 He has worked in natural gas fields before and the smell that day was stronger than when he was working.
- 25 They ended up at his grandparents' house who told them about the oil spill. They returned home after dinner and stayed there that night.

- 26 His stomach was hurting and he was dizzy. He had diarrhea and a sick feeling. He also had headaches. He never went to a doctor for his symptoms.
- 27 The headaches occurred every day, but would come and go throughout the day, until they moved.
- 28 The pain in his stomach was like a bubbling kind of thing that gave him diarrhea. This lasted just a few days or so.
- 29 The dizziness occurred about every day until they moved and were associated with the headaches.
- 31 He can't say for sure but the allergies he currently has he thinks could be attributed to the oil spill. He did not have allergies like them prior to the spill. He started getting shots after dealing with them for over a year.
- 31-37 They discuss his children and their symptoms, any treatment they may have had, and how their activities were affected by the spill.
- 38 They moved back to Mayflower later in 2013 and the smell was not as bad, but every once in a while you could still smell it a little when passing certain areas. He could not smell it at their home.
- 39-42 They no longer fish in Lake Conway. He says he saw the oil being pumped from the cove into the main part of the lake. He saw the oil on top of the water and says others have told him they have seen it also.
- 43-45 They could hear the trucks and the noise from the cleanup. There was a lot of traffic and they had to take alternate routes.
- 46-47 He started seeing dead fish and ducks washing up on the shore in different places.
- 48-51 He describes his wife being pregnant during that time and worrying about her. He was also worried about his kids and says that is why they had to leave. He says they lost all their things because their landlord came and took the stuff they had packed up, and if they hadn't had to move, it would never have happened.
- 51 There was no testing of any kind done on the property they were living at.

52 He did not attend any community meetings and never called the claims line.

53-54 They discuss the lease he had with the person who rented them their home at that time and how they were evicted from another place.

55 He is concerned about his family's future health.

56-59 He explains how it was inconvenient for them to move at that time and what it was like to go live with his wife's grandparents.

60-61 He says they did not want to go back to Mayflower after the spill so their families missed time with their children.

62 He says he was seen for anxiety a few times starting in 2013.

62-63 He could smell the strong fumes up until they moved. He saw people in hazmat suits working and this concerned him because he knew it had to be serious.

64 He was not aware of the pipeline until this incident.

64-65 He worked in the oil fields before and this was different than if oil spilled at work. The fumes were a lot stronger from the spill in Mayflower. They wore white suits at that job and gloves, but no masks because the smell wasn't that strong.

65-66 He has gone to the emergency room a few times since June 2015 for bad anxiety and panic attacks, but cannot say this is all related to the March 2013 incident.

DEPOSITION SUMMARY OF VAN HAROLD WHITE, JR. (5/10/16)

Pages

5 DOB: 8/18/61

6-20 Review education and work experience. He worked as a pharmacist at Children's Hospital for close to 20 years. They discuss in detail an incident that caused him to have to resign. He then worked as a pharmacy technician instructor until license reinstated. Now works at UAMS in the Poison Control Center and also at All Care Pharmacy.

21 Married to second wife. Has 4 daughters.

23-28 Lives at 33 North Main Street, Mayflower since 2011. Describes improvements that have been made to property. He locates house on map.

28-30 He is claiming potential devaluation of property and health concerns.

30 He describes why he thinks his property is worth less now.

31 He is concerned about long-term effects to he and his family. He and his wife and daughter had headaches.

31 He is concerned that for a week or two after the oil spill he would sometimes wake up disoriented and it would take a few seconds to a minute to get his thoughts together. This had not happened prior to the spill or since that two week period, so he is attributing it to the spill.

33 He describes the inconvenience caused while out driving.

33-35 He was home the day of the spill. He went outside and the smell was overwhelming. It kind of smelled like they were repaving the road. He is not sure how he found out about the oil spill, but it might have been on the evening news. He knew something was going on because of the traffic going up and down his street.

36 He did not see any oil that day.

37-39 Both he and his wife were stopped at different checkpoints trying to get to their home.

39-41 He never saw any oil on his property. They did see the booms in Lake Conway, but did not see any actual oil in the lake or cove.

41 He thinks he may have seen some oil in the Northwoods neighborhood when he went to look.

42-44 They received several calls at the Poison Control Center around the time of the oil spill with people saying things like they had headaches and were nauseous or had asthma and should they be concerned.

45-46 He has a cardiac diagnosis called SVT, which is increased heart rate due to no specific cause. He had an ablation 9 or 10 years ago, which didn't work, but he has not had an issue in several years.

47-49 He went to his primary care for the headaches after the oil spill. His first visit after the spill was July 5, 2013. He had issues with headaches before the oil spill, getting one maybe once a month. After the spill they increased to 2 or 3 a month and are currently still occurring that frequently. He attributes the increase to the oil spill because of the timing.

50 He explains further that he used to manage his headaches with OTC medication, but in maybe November 2014 he went back to doctor and was given Fioricet to help the more severe headaches. He has had several occurrences when he has had headaches severe enough that they would interfere with family activities.

50 His doctor has never told him that the increase in frequency of his headaches were caused by the oil spill.

52-53 They review medical record from visit on July 5, 2013. He was seen for a physical and headaches. He indicated on intake form that he had been experiencing migraines since 1992. He explains that was the only option given, but that the headaches are more tension headaches as opposed to migraines.

54-55 Next record they look at is from a visit in January 2003 that indicate he had been seen for headaches in the past.

56 He did not seek medical treatment for anything other than his headaches related to the oil spill.

- 57-59 He describes what he observed related to the cleanup activities.
- 59 He did not attend any meetings and did not have any communication with anyone from Exxon.
- 61-62 They discuss his feeling of disorientation after the oil spill.
- 62 His headaches after the spill were different because of the severity.
- 63 The overwhelming smell lasted maybe a week or two, but the smell lingered for several months and then either stopped or he has become desensitized to it.
- 66 He describes his concerns about future health.